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JAN 21 2023

**In the United States District Court  
For District of Maryland Baltimore Division**

Darryl Wright	)	
Plaintiff	)	Civil Action 21 CV 149 SAG
vs	)	Ex PARTE Hearing and
1) IBM and 2) Taco Mac	)	Temporary Restraining
Order	)	
<u>RICO Primary Defendants</u> )		A Racketeering Influence
) Criminal Organization("RICO")		
		Civil Action

**Jury Trial Demanded**

**3) BWI Double Tree by Hilton, 4) Carnival Cruise Line, 5) Twin Peaks Kennesaw ,Ga, 6) La Quinta Inn Homewood, Al, 7) Capital Jazz Super Cruise Festival, 8) Inner Harbor Baltimore Marriott**

**Hotel, 9) Marriott Woodland Hills, Ca., 10) Marriott Grande Vista, Orlando, FL, 11) Marriott Renaissance Hotel Santo Domingo, Dominican Republic, 12) Riazor Hotel Santo Domingo, Dominican Republic, 13) Sheraton Hotel Santo Domingo, Dominican Republic, 14) BWI Sheraton Hotel, 15) Four Points Sheraton Hotel Los Angeles, 16) Sheraton Old San Juan Hotel, 17) Sheraton Cancun Resort & Towers, 18) Royal Lahaina, Maui, Hi, 19) Outriggers Waikiki Beach Resort Honolulu, Hi, 20) Aviation Inn, 21) North Las Vegas, NV. , 22) Dugan's Bar and Restaurant, 23) Dave & Buster's Marietta, GA, 24) Doc's bar and restaurant, 25) Isle of Verde Hampton Inn and Suites San Juan, Puerto Rico, 26) Atlanta North Druid Hills Hampton Inn Hotel, 27) BWI Embassy Suites Hotel, 28) Ft Lauderdale Embassy Suites, 29) Palace Hotel San Francisco, 30) The Grill bar and restaurant Austell, Ga, 31) Tropicana Casino Atlantic City, 32) MGM Grand Las Vegas, 33) Tidewater Condos Panama City Beach, 34) Splash Condos Panama City Beach, 35) Hyatt Regency New Orleans, 36) LA Fitness Kennesaw, Ga, 37) Pier Sixty-Six Hotel & Marina Hyatt , Ft Lauder, 38) Nik's Restaurant Marietta, Ga, 39) La'Parilla Dallas Hwy Marietta, Ga and 40) Associated Credit Union Dobbins Air Force Base 41) IHG/Holiday Inn Express Suites North Charleston.**

**RICO co-conspirators**

**Motion for Temporary Restraining Order against Primary RICO defendants and RICO Co-conspirators in preparation for a preliminary injunction.**

**i.1**

- **Pro Se Plaintiff Darryl Wright respectfully moves to an ex parte hearing, pursuant to Title 18, United States Code, Section 1345 and 2521 and Rule 65(b) of the Federal Rules of Civil Procedure, for a Temporary Restraining Order injunctive relief against IBM and Taco Mac and the above co-conspirators with order to show cause why a permanent Preliminary Injunction should eventually be granted, and other ancillary relief. If the court requires additional arguments beyond the materials submitted in support of this motion.**
- **Plaintiff also request the court schedule an ex parte hearing on or before February 16, 2021 according to FRCP rules.**
- **RICO defendants and co-conspirators collectively conducted and violated federal Racketeering Influenced and Corrupt Organization Act, 18 U.S.C. 1961 et seq. ("federal RICO"), and Maryland's Racketeering Influenced and Corrupt Organization Act.**

**Federal and diversity questions are properly answered since some of the crimes committed against plaintiff Wright and family in**

the state of Maryland and other states in the US, other countries and at sea.

- This is a federal and Maryland Racketeering Influence and Corrupt Organization (“RICO”) action for fraud on the US justice system and obstruction of justice during the normal process of filing a civil lawsuit.
- 
- Defendants employed a lawsuit prevention protection racket service sold, designed and orchestrated by law firms and their lawyers then executed by foot soldiers their investigators.
- 
- This service is finance by US fortune 500 company defendant IBM and to a lesser extent a franchise restaurant owners of Taco Mac over a 16-year period.
- This is a RICO civil action with organize crime allegations by defendants and co-conspirators who used, aided and abetted a law firm’s service sold as a lawsuit prevention protection racket to prevent, in perpetuity, plaintiff and family from accessing the US court system to stop the persistent felony criminal crime wave surrounding plaintiff and family in and out of their home.

### **Ex parte Hearing Required**

- The primary reason for the ex parte hearing is to discuss plaintiff request for this temporary restraining order against primary RICO defendants IBM and Taco Mac and the above

listed co-conspirators and other sensitive and criminal issues. A service sold by law firms, lawyer's crime fraud exception, subpoenas of US district court personnel for depositions(at least three) and why plaintiff and family had no choice but to be here in federal civil court.

- 
- Plaintiff is here to permanently end 16 years of incessant 24/7 unlawful surveillance in and outside his family's home and the constant relentless perpetual felony criminal crime wave surrounding plaintiff and his family.
- 
- Primary Rico defendants and co-conspirators have no right to criminally surveil plaintiff and family. They have used illegal surveillance to plot past, present and future crimes. Together they are simply a professional criminal racketeer enterprise and should be treated as such by this court under the US and Maryland organize crime RICO statutes.
- 
- RICO defendants and their lawyers are the architectures and orchestrators of a professional criminal enterprise or lawsuit prevention protection racket who unleashed a 16-year crime wave against plaintiff and family. Using street gang or mob tactics to shield their clients from legitimate lawsuits at any cost by committing any crime imagined. Defendants and their lawyers are deliberate lawbreaker no different than any street gang with gang leaders or mob bosses financed by a US fortune 500 company IBM and a smaller size company Taco Mac with persistence annual revenues. Financing a criminal enterprise to prevent lawsuits indefinitely.

□

During the ex parte hearing, we also hope to discuss the forthcoming 60 day injunctive relief to allow plaintiff to assemble his RICO counsel team to develop a thorough RICO federal complaint detailing all civil and criminal offences over a 16 year period, at least five vital and essential subpoenas and depositions, affidavits, expedited discovery, the attorney client privilege crime-fraud exception for the law firms and lawyers, private investigators who sold their clients a criminal and illegal service we are calling a "lawsuit prevention protection racket." Designed and orchestrated to shield wealthy clients from legitimate lawsuits and an eventual jury trial in a US court of law.

- Due to the egression nature of the crimes outline in this motion, Pro Se plaintiff Wright does not want the court to rule on this temporary restraining order motion until critical and vital subpoenas and depositions have been taken by a US Attorney due to the nature of the criminal enterprise and the international and federal crimes committed during a 16-year period. Planning of these crimes were done in the United States then executed abroad on a US citizen which is against US law. Crimes were committed in Maryland, Georgia, Florida, Nevada, California, Hawaii, New York, New Jersey, Dominican Republic and at sea during Carnival Cruise cruises.

Pro Se plaintiff has discovered that RICO defendants have been financing fraudulent judicial proceedings out of the United States District Court Georgia Atlanta Division Clerk office on the 22 floor of the Richard Russell Federal Building. The Clerk office routes certain cases to a fraudulent service being financed by

**the defendants. All rulings are done in the clerk office and a US District Judge never sees the complaints.**

**Plaintiff have file two civil actions against defendants since 11/19/2019. Both were routed via the US District Clerk office to a fraudulent judicial service being paid for by the defendants.**

**This fraudulent service has a US District Trial Judge impersonator. Others are impersonating US District Court Clerks, US Marshals and lawyers from the Jones/Day law firm. They hold fake remote Zoom meeting with actors. Actors impersonating lawyers representing various defendants in lawsuits. The meetings are designed to frighten and scare plaintiffs without lawyers from filing lawsuits. The impersonating trial judge threatens to destroy plaintiff case by making rulings that will prevent plaintiffs from ever filing lawsuits against the defendants again. The impersonating trial judge says all lawsuits by plaintiffs will be routed by the clerk to this one judge all the time. Basically, thwarting lawsuits filed by plaintiffs forever. Finally, plaintiffs are encouraged to dismiss their lawsuits against defendants.**

**To combat this lawsuit prevention protection racket, plaintiff is asking the court to immediately refer this case to US Attorneys who can subpoena and take deposition of the persons impersonating a US District Judge, impersonating US District Clerk, impersonating US Marshals and their impersonating attorneys before any rulings.**

## **□ The Relief Plaintiff is Asking for from this court**

- Plaintiff is asking the court to force RICO defendants to disclose and remove of all surveillance devices in or around plaintiff's family home, disclose and remove all illegal wire taps from his family home phones, disclose and remove of all tracking or hacking devices or software on plaintiff's home networks or computers or electronics devices, disclose and remove of all tracking apps from all home electronic devices or software on plaintiff family's electronics devices both home or mobile devices, disclose and remove of all tracking devices on plaintiff family automobiles, disclose and remove of all drug injection devices in plaintiff's home used to drug him daily, disclose and remove of all torture devices used on plaintiff and family in his home or automobiles, disclose and remove all hacking and tracking apps from plaintiff' wife's work laptop(owned by Anthem), disclose of all plaintiff's neighbors who assisted in this surveillance and monitoring scheme, disclosure of the 24/7 monitoring site and its personnel where plaintiff and family were illegally surveilled for years. Surveillance personnel will have to be disposed for testimony.

## **• Origins of the criminal racket against plaintiff**

- For 16 years, primary RICO defendants have finance and unleashed a Professional Criminal Enterprise(PCE) lawsuit prevention protection racket to intimidate, discourage, delay or thwart legitimate lawsuits against RICO defendants. Client's pay the law firm a perpetual retainer fee then the law firm pays the



**criminal enterprise racket to criminally intimidate, harass, discourage or threaten plaintiffs from filing lawsuits. Clients pay the lawsuit prevention protection racket instead of allowing the dispute to be settled and decided in court by a jury.**

- To do this, the lawsuit prevention protection racket deploys tactics used by criminal racketeering street gangs or mobs to prevent plaintiffs from accessing counsel of choice. If the future lawsuit will lead to damaging publicity or an enormous reward, the criminal enterprise lawsuit prevention protection racket is paid exorbitant and long-term fees to prevent plaintiff's case from ever reaching the US court system. And if the plaintiff somehow arrives in court with proper counsel, they have criminal solutions for that too. As the court will see in this temporary restraining order, in a future federal complaint and discovery, this is a very lucrative service for rogue law firms to offer to their wealthy clients with limitless funds from their successful business profits. The client says to the lawsuit prevention protection racket just make the lawsuits go away and we will pay you as much money as required and for as long as possible to prevent the lawsuit from reaching a jury.**
- 
- Nowhere in the US criminal or civil codes gives RICO defendants and their co-conspirators a constitutional right to perpetually conspire, plot and violate US RICO criminal statutes and other international, federal, state and local statutes to protect themselves from legitimate lawsuits. There is no legal reasoning by any US court or US statute that allows an organized criminal racket to shield themselves from legitimate lawsuits using a lawsuit prevention criminal protection racket financed by RICO**

defendants using their legal business funds. In other words, they have, over years, been financing a money laundering criminal enterprise to prevent lawsuits-a service sold by their lawyers. Now that they have gotten caught. This lawsuit is here in court today to enforce US criminal and civil statues against them and stop this felony criminal crime wave against plaintiff and his family.

- This court has no legal or legitimate right or reasoning to ignore this criminal behavior or allow it to continue or sanction past present future criminal behavior brought to this court's attention. The criminal crime wave surrounding plaintiff and family must be stopped.

□ **Continued Irreparable Harm to Plaintiff and Family's life for 16 years and ongoing**

- Pro Se plaintiff Wright is here in court for relief to reclaim his family's home, his family's privacy, his honor, his dignity which has been irreparably harm for 16 years and is presently being irreparably harm by a relentless lawsuit prevention protection racket criminal racketeering enterprise we call a Professional Criminal Enterprise (PCE). By close examination, this enterprise is a RICO lawsuit prevention protection racket that has daily and for years unlawfully surveilled, stalked, criminally defamed, spied on, filmed, drugged, tortured and psychologically traumatize plaintiff and family. This lawsuit prevention protection racket has been financed by fortune 500 RICO

**defendant IBM and Taco Mac's using legal revenues over a 16-year period. RICO defendants have laundered those funds into a perpetual sustaining organize crime racket and will continue to do so until this court cease all criminal activity. We suspect the RICO co-conspirators use these type of services too since they willing and deliberately aid and abet the criminal enterprise.**

- During the 16 years, plaintiff has been psychological traumatize, drugged and tortured in his at home, at work, hotel rooms, condos and cruise cabins and even at friend's home. Plaintiff has also sustained and been hospitalize for two strokes do to stress, torture, drugs, psychological trauma and experiments being tried on him. The first stroke was at IBM's River Edge complex where an ambulance was required to take him to Northside Hospital. The second was at home where his wife took him to Well-Star Hospital for treatment. Both times the diagnosis by his Vascular Neurologist was a TIA or minor stroke due to stress. After a battery test, MRIs and CAT scans, nothing was physically found to cause the symptoms except stress. Plaintiff has no history of high blood pressure, heart disease or stress before RICO defendants unleashed their lawsuit prevention protection racket on plaintiff and family.**
- All plaintiff friends have been coerced, intimidated, threaten or extorted to work against him over the years. Some of those relationships go as far back as 50 years. After this lawsuit, those relationships will be permanently damaged and unrepairable. The loss of those relationships are incalculable.**

- Plaintiff has only discussed minor details with his wife and mother about what has been going on during the years in his family home. If he did, they would not want to spend another hour in their home of 22 years or travel anywhere and feel safe.
- 
- His family home cannot be sold at any price with what has been done to it by the lawsuit prevention protection racket.
- Simply put, RICO defendants have turned plaintiff's life into a nightmare. His home into "a house of horrors" and an experimental "biological lab." Using many felony criminal racketeering methods to intimidate, discourage, delay and thwart investigations and lawsuits with the assistance of co-conspirators who aided and abetted and propagating their criminal activities on their premises.
- 

## • **PARTIES, JURISDICTION AND VENUE**

### **1.8**

- Plaintiff Darryl and Rochelle Wright and (Darryl's mother) Jovettia Cooper were born in the US and reside in Marietta, Ga. which is the Northern District of Georgia.

### **1.9**

- **RICO defendants and co-conspirators are headquartered and located in many different jurisdictions across the US and other countries. This court has personal subject matter jurisdiction for this RICO action.**

**1.10**

- **This Court has subject matter jurisdiction over this case pursuant to 18 U.S.C. 1964, 28 U.S.C 1332 (federal question) and 28 U.S.C 1367 (ancillary jurisdiction).**

**a. Venue is proper in this district, pursuant 10 28 U.S.C. many of the defendants and co-conspirators either live in Maryland or do business in Maryland. Venue is also proper in this district pursuant to 18 U.S.C. 1965, as defendants and co-conspirators reside in and transacts it affairs in Maryland.**

**1.11**

**RICO Defendants Criminal Offences**

- **RICO primary defendant IBM is a US corporation with worldwide sales and services with headquarters in Armonk, NY.**
- **Federal and state offences violated over 16 years:**
- 
- **18 U.S. Code CHAPTER 96—**

## **RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS**

- **Fraud against the US Justice by financing and using an organized Professional Criminal Enterprise (PCE) lawsuits prevention protection racket to cheat, distort and obstruct the US Justice System by discouraging, delaying or thwarting legitimate lawsuits violating a multitude of organize federal and state criminal offences and statues such as:**
- **Unlawful 24/7 surveillance of plaintiff and his family in and out of his family's home, hotels, condos, cruise ship cabins, resorts and friends' home since 2004 (O.C.G.A 16-11-62)**
- **Home invasion of plaintiff's family home (O.C.G.A 16-7-5)**
- **Daily Breaking and entering of plaintiff home (O.C.G.A 16-7-1)**
- **Daily breaking and entering plaintiff cars and rental cars (16-818)**
- **Daily Stalking of plaintiff all over the world.**
- **Criminal Harassment**
- **Criminal Trespassing**
- **Daily Criminal Damage of his property**
- **Daily assault and battery (16-5-21)**
- **Acts of Terrorism**
- **Terroristic Threats to plaintiff in public**
- **Daily drugging with drugs that cause hallucinations, drugs that cause frequent urination and drugs that cause frequent bowel movements.**
- **Unlawful restraint in his home.**
- **Daily of torture (physical and mental)-sleep deprivation, foot torture, hypnosis, Chines water torture.**

- Torture in hotels, resorts, condos, cruise ship cabins and friend's homes.
- False imprisonment in his home.
- Computer and Cyber Crimes
- Hacking plaintiff electronics
- Hacking plaintiff's cell home
- Hacking of plaintiff network
- Hacking of plaintiff camera systems
- Hacking of ADT's network
- Hacking of ATT's internet network
- Hacking of ATT's home phone network
- Hacking of Comcast Network
- Hacking of DirecTV's network
- Hacking of law firm's websites (we have pictures)
- Intercepting phone calls to lawyers both by home phone or cell
- Hacking of Marriot's website (we have pictures)
- Hacking of Sheraton's website (we have pictures)
- Hacking of the FBI's website multiple times (we have pictures).
- Mail and Wire Fraud
- Capturing cell phone calls from the air
- Illegal interception Electronic communications
- Criminal Defamation (O.C.G.A 16-11-40)
- Intimidating plaintiff friend's
- Threatening plaintiff's friends
- Extorting plaintiff friends
- Harassing plaintiff friends
- Extortion (16-8-16)
- Blackmail
- Bribery (O.C.G.A 16-10-2)
- Mail and Wire Fraud (18 USC Ch.63)

- **Illegally monitoring plaintiffs and family bank accounts**
- **Tracking plaintiff using those accounts**
- **Bank Fraud (tracking plaintiff through the use of his bank cards)**
- **Money Laundering of legal funds to a criminal enterprise for illegal activities**
- **Special maritime and territorial jurisdiction (18 USC 2111)**
- **Impersonating a law firm's office to get intelligence from plaintiff**

### **1.12**

- **RICO primary defendant Taco Mac is a Georgia base corporation with restaurant chain in the Atlanta metropolitan area. They are headquartered in Alpharetta, Ga.**

- **18 U.S. Code CHAPTER 96—  
RACKETEER INFLUENCED AND  
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**legitimate lawsuits violating a multitude of organize federal and state criminal offences and statues such as:**

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- **Illegally monitoring plaintiffs and family bank accounts**
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- **Money Laundering of legal funds to a criminal enterprise for illegal activities**
- **Special maritime and territorial jurisdiction (18 USC 2111)**

- Impersonating a law firm's office to get intelligence from plaintiff

**Co-defendants Conspired with RICO Defendants to Violate Plaintiffs Hotel rooms, Condos, Resort rooms and Cruise ship cabins repeatedly**

- RICO co-conspirators had two obligations to plaintiff and family while they stayed on their premises 1) to keep their paying guest safe from harm and 2) to guard plaintiff's privacy. They failed miserably by every metric measure. They gave PCE unfettered access to plaintiff's rented room beforehand and during his stay allowing them to spy on plaintiff and family, to film plaintiff and family, to drug plaintiff and to torture plaintiff while he occupied rooms. PCE commits these same crimes at plaintiff's home and at work.
- RICO co-conspirators are facilitators, participators and aid and abettors to the professional criminal enterprise criminal behavior to torments plaintiff and his family on their premises or properties. Plaintiff has never been accused of any criminal deeds or infractions on any of defendants or co-conspirator's premises or properties. Defendants and co-conspirators will not be able to legitimately answer this complaint with any credible evidence to a courts' satisfaction except to say we can get away it with all the money in the world.

## **1.5**

- **From the time plaintiff made his reservation until the time he arrived on the RICO co-conspirator's premises, primary defendants and co-conspirators conspired using the lawsuit prevention protection racket Professional Criminal Enterprise (PCE) to unlawfully surveil, defame, harassed, tortured, drugged and criminally tormented plaintiff. Primary defendants had a premeditated detailed scheme for plaintiff then they were aided and abetted by co-conspirators. The Professional Criminal Enterprise work frantically and collectively with their coconspirators to prevent plaintiff from accessing the US justice system, mainly counsel of his choice and to aid in obstructing justice with fraud. As the court will see, some of the coconspirators are repeat offenders to this fraudulent criminal behavior by the lawsuit prevention protection racket (PCE).**

## **1.13**

**Financing fraudulent judicial proceeding using the US District Clerk office on the 22<sup>nd</sup> floor of the Richard Russel Federal Building in Atlanta, Ga. These proceeding are paid for by the defendants and orchestrated for defendants- not neutral to plaintiffs.**

**Plaintiff paid the court clerk a filing fee for a neutral US civil court proceeding to settle a dispute between plaintiff and defendants. The court cashed plaintiff's check in bad faith. Plaintiff did not pay the filing fee to have rulings done in the clerk office or by someone impersonating a US District judge (see attachment to this action for plaintiff bank highlighted recordings of the filing fees cashed by defendant's lawsuit prevention protection racket).**

**Plaintiff's checks were cashed three times. Therefore, there are three counts of fraud by defendants.**

**Defendants orchestrated a fraudulent Zoom(recorded) meeting to intimidate plaintiff from filing a lawsuit against defendants (see attached transcript from the October 13<sup>th</sup> 2020 Zoom meeting orchestrated by someone impersonating a US District Trial Judge and lawyers representing various firms noted in this lawsuit).**

**Plaintiff has seen US District Judge William Ray before and has been in his court room. The impersonator in the Zoom video does not look like Judge Ray. The Zoom video will clearly show that the proceedings were done for the benefit of the defendants and not the plaintiff. The judge impersonator had not even read the 115-page complaint and did not know the subject matter of the case. Everyone on that call knew the judge was way over his head.**

**We will be subpoenaing the actual Zoom recorded video for proof of judicial fraud. We will also take deposition by the real Judge William Ray about his rulings on plaintiff cases, the US District Court Clerk about the filings and the US Marshal for the Richard Russell Federal Building in Atlanta about the occupants of the 22<sup>nd</sup> floor for proof of this fraudulent judicial proceeding financed by defendants.**

**Review the fraudulent October 13,2020 Zoom meeting the fraudulent judge held transcript with the attachment for this case, case CV-19-5213 and case CV-20-3928. His ruling was always**

**against the plaintiff. Fraudulent Judge was being paid by the defendants to thwart lawsuits.**

**As you will see, none of these criminal offences would not have happened but for the illegal surveillance deployed by defendants.**

**\***

**IHG/Holiday Inn Express is an international hotel conglomerate with hotels all over the world. Regionally headquartered in Atlanta, Ga.**

**On January 08, 2021, plaintiff and his mother checked into Holiday Inn Express in North Charleston to attend a funeral of his cousin. Plaintiff was given room 408 and his mother was given room 424.**

**During the night and morning, plaintiff was subjected to persistent torture and sleep deprivation in his room. So much so, plaintiff left the room to file a complaint using the hotel's business center workstation (see attachment to this action for the complaint filed on 01/09/2021 and description of the daily torture).**

**Plaintiff also complained about the torture events during an online survey and sent complaints to the hotel and corporate regional office.**

**Plaintiff is accusing IHG/Holiday Inn Express of the following:**

- 1) Multiple counts of gross Negligence.**
- 2) Giving PCE unfettered access to plaintiff's room and their hotel.**
- 3) Multiple counts of assault and battery.**
- 4) Aiding and abetting a criminal enterprise.**

\*

- **RICO co-conspirators PMD I, LLC and Hilton are owner and operator of BWI Doubletree by Hilton. They are repeat offenders.**
- **Plaintiff and friend Cameo (Damiel Michel) has stayed at this location multiple times over the years during their annual Chesapeake Bay fishing trip. It has close proximity to BWI airport, restaurants, the fishing hole, Baltimore, MD and other convenient locations. At every stay in the past and as recently as Labor Day August 2019, plaintiff Wright has been spied on, filmed, tortured and drugged by representative of primary RICO defendants IBM and Taco Mac. During the August 2019 trip and as he was checking out, he was told by the front desk, that he did not pay for his three-day stay and that he would have to contact the organization who paid for it to get a checkout receipt. The front desk personnel did not say who paid for his stay. But she did say that the only evidence of his stay at the hotel was his on file credit card. No**

**evidence of his advance payment for the room. Plaintiff Wright detected a cover up of crimes and their collaboration of those crimes during August 2019 Labor Day weekend.**

- **After returning home, plaintiff Wright sent PMD I LLC a complaint about what happen during his stay with an evidence preservation letter for that weekend. Plaintiff soon will be seeking subpoenas for documents and videos outlined in this complaint (see section titled “subpoenas” for the evidence preservation letter sent to the hotel and corporate office on September 20<sup>th</sup> 2019 after the events).**
- **Plaintiff is accusing PMD I, LLC and Hilton of the following offences:**
  - 1) Multiple counts of Negligence over the years.**
  - 2) Giving PCE unfettered access to plaintiff’s room and hotel.**
  - 3) Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays at BWI Double Tree Hilton.**
  - 4)Assault and battery**



**RICO co-conspirator Hilton is a global hotel company with many franchises such as Doubletree, Embassy Suites and Hampton Inn. Hilton is headquartered in McLean, Va.**

**Hampton Inn North Druid Hills Atlanta, Ga on 06/2015 during a short stay in Atlanta to get rest and use the hotel phone system and computer. While in his room, plaintiff tried calling a lawyer via hotel's phone system but was intercepted and routed to the Professional Criminal Enterprise personnel who answered his call to a lawyer then tried to discourage him from obtaining a lawyer. Plaintiff waited over an hour to get access to his room. He paid with an American Express gift card that he purchased at Walgreens drug store just to throw PCE off. Plaintiff accuses repeat offender defendant Hampton Inn of the following offences during his short stay:**

**1) Negligence.**

**2)Obstruction of justice by intercepting phone calls to lawyers.**

**3)Wire Fraud (intercepting calls from his room)**

**4)Giving PCE unfettered access to plaintiff's room and its hotel.**

**5)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal**

**defamation, and criminal harassment during his stays on their properties.**

**6)RICO co-conspirator Hilton is a global hotel company with many franchises such as Doubletree, Embassy Suites and Hampton Inn and a repeat offender. Hilton is headquartered in Mclean, Va.**

**\***

**Plaintiff accuses Embassy Suites BWI from 07/18/2015 to 07/21/2015 while he and Cameo stayed at its hotel during his annual fishing trip. Plaintiff accuses Hilton of the following offences during his stay:**

**1)Multiple counts of Negligence during his stay.**

**2)Giving PCE unfettered access to plaintiff's room and its hotel.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays while plaintiff is on their properties**

**RICO co-conspirator Sheraton is a global hotel company with many franchises and is headquartered in White Plains, NY.**

**Plaintiff Wright and IBM Steve Dickens stayed two days on 10/24/2015 at Sheraton Old San Juan Puerto Rico before a Capital Jazz Festival Super Cruise event leaving out of San Juan Puerto Rico. Plaintiff Wright and IBM Steve Dickens shared a room. During plaintiff stay, plaintiff accuses Sheraton Old San Juan of allowing the Professional Criminal Enterprise to take over the hotel to do the following:**

**1)Gross Negligence.**

**2)Giving PCE unfettered access to plaintiff's room and its hotel.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**\***

**RICO co-conspirator Hilton is a global hotel company with many franchises such as Doubletree, Embassy Suites and Hampton Inn and a repeat offender. Hilton is headquartered in McLean, Va.**

**Hampton Inn Suites Isle of Verde, Puerto Rico on 11/01/2015 during which he stayed after a Capital Jazz Fest Super Cruise event. Plaintiff accuses repeat offender defendant Hampton Inn of the following offences during his short stay: 16) Negligence.**

**1) Giving PCE unfettered access to plaintiff's room and its hotel.**

**2) Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**RICO co-conspirator Hilton is a global hotel company with many franchises such as Doubletree, Embassy Suites and Hampton Inn. Hilton is headquartered in McLean, Va.**

**RICO co-conspirators PMD I, LLC is the owner and operator of BWI Doubletree by Hilton which are repeat offenders.**

**Plaintiff and Cameo (Damien Michel) stayed at BWI Doubletree regularly during his annual fishing trip in July 2016. Plaintiff is accusing Hilton (another repeat offender) and its franchises of the following criminal offences:**

**1)Multiple counts of Negligence during his stay.**

**2) Giving PCE unfettered access to plaintiff's room and its hotel.**

**3) Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays while plaintiff is on their properties.**

**a.14**

**RICO co-conspirator Marriott is a global hotel company with may franchises headquartered in Bethesda, Md. Marriott owns Sheraton and its franchises.**

**Plaintiff was there with Cameo (Damiel Michel) and Dollar Bill for his annual fishing trip. Plaintiff accuses Marriott Baltimore Inner Harbor of the following criminal offences:**

**1)Multiple counts of Negligence over the weekend.**

**2)Giving PCE unfettered access to plaintiff's room and its hotel.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery,**

**criminal defamation, and criminal harassment during his stays on their properties.**

**Plaintiff reported incidents to Marriott using their website, email and FED-EX and they did nothing to rectify this reoccurring problem.**

**\***

**RICO co-conspirator Marriott is a global hotel company with may franchises headquartered in Bethesda, Md. Marriott owns Sheraton and its franchises.**

**Plaintiff stayed there two days with his wife, daughter, mother and niece in preparation for his daughter's PhD graduation cruise on Carnival Ship Elation. Plaintiff is accusing Marriott Grand Vista Orlando on 05/09/2019 (another repeat offender) of the following criminal offences during his daughter graduation cruise.**

**1) Multiple counts of Negligence over the years.**

**2)Giving PCE unfettered access to plaintiff's room and its hotel.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**Plaintiff reported incidents to Marriott using their website, email and FED-EX and they did nothing to rectify this problem.**

**RICO co-conspirator Carnival Cruise is a global cruise line headquartered Miami, Fl.**

**Plaintiff is accusing Carnival Cruise (another repeat offender) and its Cruise Ship Elation of the following criminal offences during his daughter's PhD graduation cruise on 05/11/2019 where he shared a cabin with his wife and daughter.**

**1)Multiple counts of Negligence over the years.**

**2)Giving PCE unfettered access to plaintiff's cabin.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**RICO co-conspirator Palace Hotel San Francisco is owned by Kyo-Ya Hotels & Resorts headquarters out of Honolulu, Hawaii. 42) Plaintiff is accusing The Palace Hotel of San Francisco on 02/2015 of the following criminal offences while his wife Rochelle Wright attended an Oracle conference in San Francisco. Anthem paid for the room:**

**1) Negligence.**

**2) Giving PCE unfettered access to plaintiff's room and its hotel.**

**3) Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

## **1.16**

**RICO co-conspirator Hyatt Regency is a global hotel company headquartered out of Chicago, IL.**

**Plaintiff is accusing Hyatt Regency Loyola Street New Orleans, La. of the following criminal offences on 06/02/2016 to 06/08/2016 while wife was attending an Oracle conference. Her employer Anthem paid for the room.**

**1) Negligence.**



**2)Giving PCE unfettered access to plaintiff's room and its hotel.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**a.17**

**RICO co-conspirators Pier Sixty-Six Hotel & Marina Fort Lauderdale is owned by Hyatt headquartered out of Chicago, Il.**

**Plaintiff is accusing Pier Sixty-Six Hotel & Marina Fort Lauderdale on 11/15/2015 of the following criminal offences while he, Cameo (Damien Michel) Cameo's cousins Todd and Mike and Vincent Stevens were in town for a Miami Dolphin NFL Football Game. Plaintiff and Vincent Steven stayed in the same room:**

**1)Negligence.**

**2)Giving PCE unfettered access to plaintiff's room and its hotel.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**1.17**

**RICO co-conspirator Carnival Cruise is a global cruise line headquartered Miami, Fl.**

**Plaintiff is accusing Carnival Cruise (another repeat offender) and its cruise line of the following criminal offences during years 2012, 2013, 2014, 2015 and 2016 the Capital Jazz Fest Super Cruise events in which he shared cabins with IBM Steve Dickens every time:**

**1)Multiple counts of Negligence over the years.**

**2)Giving PCE unfettered access to plaintiff's cabin.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**1.18**

**RICO co-conspirator MGM Grand Hotel and Casino Las Vegas is headquartered in Paradise, NV.**

**Plaintiff is accusing MGM Las Vegas on 09/27/2015 of the following criminal offences while he and his wife Rochelle Wright was on a business trip for her company Anthem. Plaintiff shared the room with his wife. Anthem paid for the room.**

**1)Negligence**

**2)Giving PCE unfettered access to plaintiff's room and its hotel.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**1.19**

**RICO co-conspirator Tropicana Casino Atlantic City is he owned by MGM Grand headquartered in Paradise, NV.**

**Plaintiff is accusing Tropicana Casino Atlantic City on 08/06/2015 to 08/10/2015 of the following criminal offences while he and his wife vacationed with her mother, father and**

**sister for a weekend in Atlantic City. Wife Rochelle Wright use her American Express card for payment:**

**1)Negligence**

**2)Giving PCE unfettered access to plaintiff's room and its hotel.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**a.21**

**RICO co-conspirator Tidewater Condos Panama City Beach is owned by Wyndham Vacation Rentals which is headquartered in Parsippany-Troy Hills, NJ.**

**Plaintiff is accusing Tidewater on 04/2015 (another repeat offender) during his and IBM Steve vacation at the annual Panama City Beach Sea Breeze Jazz Festival of the following criminal offences:**

**1)Multiple counts of Negligence over the years.**

**2)Giving PCE unfettered access to plaintiff's condos.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery,**

**criminal defamation, and criminal harassment during his stays on their properties.**

**Plaintiff reported incidents to Tidewater who did nothing to rectify this problem.**

**RICO co-conspirator La Quinta Inn Homewood, AL is owned by Wyndham and is headquartered in Irving, TX.**

**Plaintiff is accusing La Quinta Inn on 07/12/2015 of the following criminal offences during his one-day stay to Birmingham, AL. The Professional Criminal Enterprise took over the hotel. While at the hotel, plaintiff noticed a Birmingham Sheriff SUV vehicle was outside in the parking lot.**

**1)Negligence**

**2)Giving PCE unfettered access to plaintiff's room and its hotel.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**a.22**

**RICO co-conspirator Splash Condo Panama City Beach is owned by Wyndham Vacation Rentals which is headquartered Parsippany-Troy Hills, NJ.**

**Plaintiff is accusing Splash Condo Panama City Beach (another repeat offender) during plaintiff Wright and IBM Steve 's vacation to the annual Panama City Beach Sea Breeze Jazz Festival of the following criminal offences:**

**1)Multiple counts of Negligence over the years.**

**2)Giving PCE unfettered access to plaintiff's room and its hotel.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**a.23**

**RICO co-conspirator Sheraton is a global hotel company with many franchises such as Four Points headquartered in White Plains, NY.**

**Plaintiff stayed at Sheraton BWI during a Baltimore Ravens football game on 09/11/2016 and Washington Redskins Football Game on 09/12/2016 in room #327. The Professional Criminal Enterprise took over the hotel. After torturing him during the night, plaintiff left the hotel and checked into the Hilton Garden BWI room#245. The Professional Criminal Enterprise followed him to the BWI Hilton Garden where they had installed gadgets in room #245 causing plaintiff to be sleep deprived for that night.**

**1)Multiple counts of Negligence during his stay.**

**2)Giving PCE unfettered access to plaintiff's room and its hotel.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**\***

**Plaintiff reported incidents to Sheraton via their website, email and FED-Ex and they did nothing to rectify this problem.**

**RICO co-conspirator Sheraton is a global hotel company with many franchises such as Four Points headquartered in White Plains, NY.**

**Plaintiff stayed at the Sheraton Santo Domingo Dominican Republic from 08/31/2017 to 09/04/2017 during a vacation trip with his high school friend Daimel Michel. The Professional Criminal Enterprise took over the hotel. During his stay, plaintiff accuses Sheraton Santo Domingo Hotel Dominican Republic of the following offences:**

- 1)Multiple counts of Negligence during his stay.**
- 2)Giving PCE unfettered access to plaintiff's room and its hotel.**
- 3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**RICO co-conspirator Sheraton is a global hotel company with many franchises such as Four Points headquartered in White Plains, NY.**



**Plaintiff stayed at the Sheraton Santo Domingo Dominican Republic from 01/04/2018 to 01/09/2018 during a vacation trip by himself this time. The Professional Criminal Enterprise took over the hotel. During his stay, plaintiff accuses Sheraton Santo Domingo Hotel Dominican Republic of the following offences:**

**1)Multiple counts of Negligence during his stay.**

**2)Giving PCE unfettered access to plaintiff's room and its hotel.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**Plaintiff reported incidents to Sheraton via their website, email and FED-Ex and they did nothing to rectify this problem.**

**RICO co-conspirator Sheraton is a global hotel company with many franchises such as Four Points headquartered in White Plains, NY.**

**Plaintiff stayed at the Sheraton Santo Domingo Dominican Republic from 05/22/2018 to 05/25/2018**

during a vacation trip with his high school friend Damiel Michel. The Professional Criminal Enterprise took over the hotel. During his stay, plaintiff accuses Sheraton Santo Domingo Hotel of the following offences:

**1)Multiple counts of Negligence during his stay.**

**2)Giving PCE unfettered access to plaintiff's room and its hotel.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

Plaintiff reported incidents to Sheraton via their website, email and FED-Ex and they did nothing to rectify this problem.

Riazor Hostel is a privately owned smaller hotel in Santo Domingo Dominican Republic. Riazor is a repeat offender to giving the Professional Criminal Enterprise access to plaintiff's rooms.

Plaintiff stayed at Riazo for one day on 05/28/2018. The Professional Criminal Enterprise took over the hotel and had access to plaintiff's room. Plaintiff is accusing Riazor Santo Domingo Dominican Republic of the following of offences:

**1) Multiple counts of Negligence during his stay.**

**2) Giving PCE unfettered access to plaintiff's room and its hotel.**

**3) Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**RICO co-conspirator Sheraton is a global hotel company with many franchises such as Four Points headquartered in White Plains, NY.**

**Plaintiff stayed at Sheraton BWI during his niece's graduation from high school on 06/06/2018 to 06/08/2018. He stayed there with his wife, daughter and mother. The Professional Criminal Enterprise took over the hotel. During his stay, plaintiff accuses Sheraton BWI of the following offences:**

**1) Multiple counts of Negligence during his stay.**

**2) Giving PCE unfettered access to plaintiff's room and its hotel.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**Plaintiff reported incidents to Sheraton via their website, email and FED-Ex and they did nothing to rectify this problem.**

**RICO co-conspirator Sheraton Four Points Los Angeles airport is a global hotel company with many franchises such as Four Points headquartered in White Plains, NY.**

**Plaintiff and wife stayed at the Sheraton Four Points Los Angeles airport on the first leg of their 30<sup>th</sup> anniversary on 07/21/2018. The Professional Criminal Enterprise took over the hotel. Plaintiff was drugged so much that his nose profusely bleeding while he was smoking a cigar in front of the building. Later the next day earlier morning around 3AM, he was being torture so much in his bed that he got up, went downstairs near the front desk and guest computers, logged onto a guest computer and reported a complaint via the Sheraton's portal about what was happening in their hotel. Plaintiff never heard anything from Sheraton about the incident. Plaintiff is accusing Sheraton Four Point Los Angeles (another repeat offender) of the following criminal offences during plaintiff and wife's 30<sup>th</sup> anniversary:**

**1)Multiple counts of Negligence over the years.**

**2)Giving PCE unfettered access to plaintiff's room and its hotel.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their property.**

**Plaintiff reported incidents to Sheraton via their website, email and FED-Ex and they did nothing to rectify this problem.**

**Plaintiff reported this event via Sheraton's Four Point guest computers.**

**RICO co-conspirator Outriggers Waikiki Beach Resort Honolulu, HI is base and headquarters Honolulu, HI.**

**Plaintiff is accusing Outriggers Waikiki Beach Resort on 07/24/2018 of the following offences during plaintiff and wife 30<sup>th</sup> anniversary:**

**1)Negligence**

**2) Giving PCE unfettered access to plaintiff's room and its hotel.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**RICO co-conspirator Royal Lahaina Resort Maui, Hi. is base and located in Maui, Hi.**

**Plaintiff is accusing Royal Lahaina Resort Maui on 07/2018 to 08/2018 of the following offences during plaintiff and wife 30<sup>th</sup> anniversary:**

**1)Negligence**

**2)Giving PCE unfettered access to plaintiff's room and its hotel.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**RICO co-conspirator Sheraton Four Points Los Angeles airport is a global hotel company with many franchises such as Four Points headquartered in White Plains, NY.**

**Plaintiff and wife were returning from their Hawaii 30<sup>th</sup> annual trip and stayed at the Sheraton Four Points Los Angeles airport hotel on 08/01/2018 and 08/02/2018. The Professional Criminal Enterprise took over the hotel again. Plaintiff is accusing Sheraton Four Points hotel of the following offences:**

**1)Negligence**

**2)Giving PCE unfettered access to plaintiff's room and its hotel.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**RICO co-conspirator Capital Jazz Super Cruise rented Carnival Cruise ships for events and is headquartered out of Columbia, Md.**

**Plaintiff is accusing Capital Jazz Super Cruise of the following offences while he and IBM Steve Dickens, IBM Bill Taylor and his wife Maryland were on Jazz cruise events**

**sponsored by Capital Jazz Super Cruise 2012, 2013, 2014, 2015 and 2016.**

**1)Negligence during multiple stays.**

**2)Giving PCE unfettered access to plaintiff's cabin.**

**3)Aiding and abetting a professional criminal enterprise to spy, film, torture, drugging, stalking, assault and battery, criminal defamation, and criminal harassment during his stays on their properties.**

**a.24**

**RICO co-conspirator LA Fitness is a fitness company with gyms all over the US headquartered out of Irvine, Ca.**

**Plaintiff is accusing LA Fitness Kennesaw of the following offences while plaintiff was on their premises. PCE took over the gym. Some of the offences were assisted by IBM Lonnie Arbuckle, IBM Jeff Spring and Van while on their premises:**

**1)Negligence multiple counts**



**2)Unlawful Surveillance**

**3)Spying**

**4)Filming**

**4)Torture**

**5)Defamation of plaintiff to their employees and guests**

**6)Aiding and abetting of a criminal enterprise.**

**a.25**

**RICO co-conspirator LA Fitness is a fitness company with gyms all over the US headquartered out of Irvine, Ca.**

**Plaintiff is accusing LA Fitness Austell of the following offences while plaintiff was on their premises:**

**1)Negligence multiple counts**

**2)Unlawful Surveillance**

**3)Spying**

**4)Filming**

**5)Torture**

**6)Defamation of plaintiff character to their employees and guests**

**7)Aiding and abetting of a criminal enterprise**

**RICO co-conspirator LA Fitness is a fitness company with gyms all over the US headquartered out of Irvine, Ca.**

**Plaintiff is accusing LA Fitness Houston on 02/06/2017 the following offences while plaintiff was on their premises:**

**1)Negligence multiple times**

**2)Unlawful Surveillance**

**3)Spying**

**4)Filming**

**5)Torture**

**6)Defamation of plaintiff of character to their employees and guests**

**7)Aiding and abetting of a criminal enterprise criminal acts**

**RICO co-conspirator Dave and Busters is a restaurant arcade headquartered in Dallas, Tx.**

**Plaintiff is accusing Dave and Busters Marietta of the following offences:**

**1)Negligence multiple times**

**2)Unlawful Surveillance**

**3)Defamation of plaintiff character to their employees and guests**

**4)Aiding and abetting of a criminal enterprise criminal acts**

**a.26**

**RICO co-conspirator Associated Federal Credit Union is headquartered out of Peachtree Corners, Ga.**

**Plaintiff is accusing Associated Federal Credit Union of the following offences while plaintiff was their premises:**

**1)Negligence**

**2)Defamation of plaintiff of character to their employees**

**3)Aiding and abetting of a criminal enterprise criminal acts**

**a.27**

**RICO co-conspirator Dugan's Bar and Restaurant is located in Atlanta, Ga off of Ponce De Leon Ave.**

**Plaintiff is accusing Dugans Bar and Restaurant Ponce De Leon Ave of the following offences while plaintiff was on their premises:**

**1)Negligence multiple times**

**2)Unlawful Surveillance**

**3)Repeated and surreptitiously installed an accelerant in his cigars so that plaintiff cigars burnt funny and smelt funny.**

**4)Defamation of plaintiff character to their employees and guests**

**5)Aiding and abetting of a criminal enterprise in criminal acts**

**a.28**

**RICO co-conspirator The Sports Grill is located in Austell, Ga.**

**Plaintiff is accusing The Sports Grill in Austell of the following offences while plaintiff was on their premises:**

**1)Negligence Multiple times**

**2)Unlawful Surveillance**

**3)Defamation of plaintiff character to their employees and guests**

**4)Aiding and abetting of a criminal enterprise in criminal acts**

**5)Assault and battery causing my nose to water**

**a.29**

**RICO** Co-conspirator Doc's Spirits and restaurant is located in Smyrna, Ga.

Plaintiff is accusing Doc's Spirits and restaurant of Smyrna of the following offences while plaintiff was on their premises:

**1)Negligence multiple times**

**2)Unlawful Surveillance**

**3)Defamation of plaintiff character to their employees and guests**

**4)Aiding and abetting of a criminal enterprise in criminal acts**

**a.30**

**RICO Co-conspirator Nik's bar and restaurant is located in Marietta, Ga.**

**Plaintiff is accusing Nik's Greek restaurant of Marietta, Ga of the following offences while plaintiff was on their premises:**

**1)Negligence multiple times**

**2)Unlawful Surveillance**

**3)Defamation of plaintiff character to their employees and guests**

**4)Aiding and abetting of a criminal enterprise in criminal acts**

**a.31**

**Twin Peaks Kennesaw is a restaurant franchise owned by Front Burner Restaurant LLP. Its corporate office is located in Addison, Tx.**

**Plaintiff is accusing Twin Peaks Kennesaw of the following offences while he was on their premises:**

**1) Negligence multiple times**

**2)Defamation of plaintiff character to their employees and guest**

**3)Aiding and abetting of a criminal enterprise criminal acts**

**Incident at Twin Peaks Buckhead, Atlanta on New Year's day January 1, 2021. Plaintiff, Cameo and Charlie Brown are at the bar watching college football. Around 07:30PM, plaintiff noticed he was the only one sweating profusely. His hair and hand were wet. I later look at Charlie Brown, who sat near him, was sweating on his face. No one else in the area of the bar was sweating. I suspect I was being targeted by a gadget to cause me to sweat.**

**Plaintiff accuse Twin Peaks of the following offences:**

- 1) Gross Negligence**
- 2) Assault and battery**
- 3) Aiding and abetting a criminal enterprise**

**RICO Co-conspirator La' Parilla is Mexican restaurant chain headquartered in Marietta, Ga.**

**Plaintiff is accusing La' Parilla is Mexican restaurant of the following offences while plaintiff was their premises:**



**1)Negligence multiple times**

**2)Defamation of plaintiff character to their employees and guest**

**3)Aiding and abetting of a criminal enterprise criminal acts**

**a.32**

### **ii.III. FACTS**

**Plaintiff Darryl Wright was born in the US and resides in Marietta, Ga. where he and his family have lived for 30 years. Plaintiff does not want to be here in the courts. Plaintiff has never personally sued anyone and no one has ever personally sued him. Plaintiff is here because of he and his family's long term safety, sanity and wellbeing are at stake for the rest of their lives. Plaintiff and family are desperate to get this nightmare to a jury and behind them.**

**a.34**

**Plaintiff is bringing this action against his former employer primary defendant IBM, an international company with global sales and services, who has finance a lawsuit prevention protection racket to intimidate, stalk, criminally defamed, harassed, criminally tormented, assaulted and tortured at work and at home while being employed by IBM. Even after retiring in good standing from IBM, IBM has not stopped criminally tormenting and stalking plaintiff using the lawsuit prevention protection racket scheme.**

**Plaintiff has done nothing to justify this treatment. Plaintiff does not want to be here but he has no choice. Collectively, with limitless funds, defendants and co-conspirators believe they will not be caught and believe that they can sustain this criminal enterprise indefinitely. They have done it for 16 years with funds from an endless revenue stream- their legal businesses.**

**During this temporary restraining motion, plaintiff will visually outline many RICO international, federal, state and local crimes committed by the lawsuit prevention protection racket funded IBM and Taco Mac. The evidence gathered during subpoenas, depositions and expedited discover will closely uncover additional felony criminal methods use to warrant primary defendants substantial investment into the lawsuit prevention protection racket using legal funds being laundered into organize criminal racketeering activity.**

**RICO defendants and co-conspirators lawyers are responsible for a sophisticated Professional Criminal Enterprise("PCE") constituted and organized to deprive a plaintiff and his family from their constitutional right to a civil proceeding by a neutral court without plaintiff being allowed to assemble the most competent counsel required to take this RICO civil action to a jury trial. RICO defendants are primarily using a criminal racketeering organization to discourage plaintiff from bringing forward this lawsuit to a court and jury.**

**The Professional Criminal Enterprise(PCE) has all-encompassing tentacles into international, federal, state and local law enforcement agencies which they use to coerce, intimidate, threaten, extort, bribe or persuade proprietors to act against their own interest by giving unfettered access to plaintiff's hotel room, condo or cruise ship cabins where they spy, film, torture and drug plaintiff.**

**RICO defendants and co-conspirators, who collectively have limitless funds through their legal business, set out to tenaciously, criminally torment and deliberately violate any criminal international, federal, state or local laws required to achieve their corrupt goal of tormenting and intimidating plaintiff against filing a lawsuit. RICO defendants IBM and Taco Mac are**

**using a criminal enterprise lawsuit prevention protection racket to defraud the US justice system. By hiring a corrupt lawsuit prevention protection criminal racket to discouraged, delay or thwart legitimate lawsuits against them. Defendants and their co-conspirators have an incentive to cooperate with each other since they have the same goal to thwart lawsuits. It's an easy sell.**

**Large and medium size business have a perverse incentive for hiring lawsuit prevention protection rackets law firms who can provide these services. Their clients know that lawsuit prevention protection racket would be involve using street gangs and mobs' methods but they don't think they will never get caught employing them.**

**PCE will commit any crime, tell any lie, pay any bribe, intimidate anyone, extort anyone and even use racial profiling as a tool to further their criminal enterprise activities.**

**Wherever plaintiff goes, he is being surveilled and tracked using his own electronics and other devices by PCE and with the assistance of the co-conspirators. PCE has the expertise to take control of co-conspirators computers and network, telephones and cell phone networks anywhere in the world.**

**These bold and appalling perpetrators are deliberate lawbreakers who even stalked plaintiff in the Atlanta Federal Richard Russell building on 10/16/2019 while he was there**

accessing the US Attorney's office on the 6<sup>th</sup> floor. They also followed him to through the corridors and elevators to the US District Court Clerk's office on the 22<sup>nd</sup> floor. Later from the Cobb county Vining's library, they hacked the FBI's website to prevent plaintiff from reporting their many crimes with in the federal building. Who does this type of surveillance of an innocent man in a federal building with its extensive security and ubiquitous cameras?

To further explain how PCE operates, they have hacked the top 5 Atlanta law firm's websites and intercepted calls to them from plaintiff. And PCE knows most lawyers or firms have some security so if you haven't talked to someone at the firm to schedule an interview, you are not getting in to see a lawyer. The days of walking into a law firm from the street is over. One has to communicate to them first.

For 16 years or 28% of plaintiff's life, PCE has suffocated plaintiff and family privacy and their communications to anyone including counsel. This is why plaintiff is here today. Plaintiff and family are desperately ready to stop the nightmares and move on with their lives. Plaintiffs just want a normal life without defendant's and co-conspirator's criminal surveillance and crimes. Plaintiff wants PCE out of his and his family's life forever.

Plaintiff has done nothing to justify this egregious criminal behavior. Plaintiff and family do not have a criminal record and have never personally sued anyone. Plaintiff and family do not

want to be here but they have no choice but the court system. Collectively, with limitless funds, defendants and co-conspirators believe they won't be caught and believe that they can sustain this criminal enterprise indefinitely. They have done it for 15 years with an endless revenue stream- their legal businesses

To halt this egregious criminal behavior by PCE, plaintiff is asking the US Court to propose a Temporary Restraining Order which commands defendants (PCE employer) and coconspirators to cease all surveillance of plaintiff and family, cease all criminal activities of plaintiff and refer this complaint to a US attorney's office for investigation and prosecution of an organized corrupt criminal enterprise designed to perpetrate fraud on the US Justice system.

We suspect this service is being sold in the US by law firms to their well-heal corporate clients who can afford to pay daily, weekly, monthly and yearly expenses to sustain the cost of 24/7 unlawful surveillance of innocent plaintiffs using organize crime activities. Surveillance has been used to plan, plot and commit crimes and deprive plaintiffs their right to competent counsel to litigate legal disputes- fraud on the US justice system and plaintiff.

### **Contemporary Events Memorialized**

At home 265 Lynshire Court Marietta, GA 30064

**Being watched 24 hours a day 7 days a week  
in my home.**

**Why am I so important? What's the end game?**

**-Being assaulted with water drops and water paste 8-9  
hours a day in my home office and while I work at night.**

**-Being assaulted with water, water paste gadgets to my  
back as I walk throughout my home.**

**Hidden cameras in every room and floor in  
my home.**

**Gadgets in my HVAC vents and all room  
fans.**

**-My home network and computers have been hacked into.  
I can't trust anything I look up on my computers.**

**-My shirts and tee shirts are being sprayed with a sticky  
substance. Shirts reside in my bedroom closet.**

**-I occasionally hear movement in and around my attic.**

**-My house plumbing has modified. I can hear water flowing  
through pipes with no faucets being turned on.**

**-Being assaulted with water, water paste while sleeping in  
bed and on the couch. Sleep deprived while preparing for  
third shift.**

**-home phone and cell phone are being hacked. Phone calls  
to lawyers intercepted multiple times.**

**-Lying to my doctor about what I do.**

**LA Fitness**

**At LA Fitness Kennesaw, GA Barrette Parkway location. In locker room and gym, I'm being assaulted in my back with water and by a water paste gadget. Hot air blowing on me while I work out on the treadmill and stepper machine.**

**LA Fitness management had to sanction cameras and gadgets being installed in their place. Probably, they are not aware that gadgets were installed along with the cameras. Someone with some authority must have made up a lie about me to convince them act against their own interest. These incidents have been occurring for years.**

**I suspect most of their patrons are aware of what's going on but have been told to ignore what they seen. Otherwise, they would have reported incidents to LA fitness management.**

**Torture stations at treadmill, step machine and locker room.**

**What reason did they give to convince LA fitness to allow cameras and gadgets installed with autonomous access? What did they say about me to cause LA fitness to believe I'm a problem? What did they tell the patrons about me to get them to cooperate with this hoax?**

**And more importantly, who is orchestrating these events and why?**



## **Participants**

**Regular Patrons, Van, Lonnie Arbuckle, Jeff, JR  
Davis(IBM), Kevin**

**Stopped torcher in gym early 2016. Started prep me in car before entering gym with liquid substance on my hat/head, legs and shoulder to simulate torcher during workouts.**

**My car(car of horrors)**

**I'm being assaulted with water, water paste, tracked by cellular phone GPS with cameras, driver side heated seats turning on without me initiating, drugged causing my nose to run or drip.**

**More importantly, who is orchestrating these events and why?**

**Kennesaw battle field for many years.**

**Regular Patrons harassing me with their dogs.  
Intentionally, steering dogs into my pathway while I walk or run.  
Sometimes even causing contact with me.**

**Reported incidents to park rangers multiple times. They never told me who is orchestrating these events and why.**

### **Participants**

**Patrons, Kevin, Scott and Julian(IBM).**

**Trip to Atlantic City 11/17 thru 11/21 for Bill's 50th party.**

**Thursday flew into Philly. Rented call for Jazz concert Newark, NJ.**

**After concert drove to, Atlantic City. Picked up Cameo and Troy. Checked into Atlantic City Comfort Inn.**

**Friday left for NYC. Stayed at Juno house in Queens. Gadgets were there while I slept on couch in his living room.**

**Left Saturday for Atlantic City. Checked into Marriot Residence Inn. Jerry paid for room. Prepared for party. After party, Cameo tried to make me turn the wrong way while driving. Got back to room. While sleeping gadgets in bed.**

**Sunday watched football at Jerry's house. Bill talked about me being a mystery. Leaving for days without letting**

anybody know where I going. He never talked about that issue before. 266) Monday fly home.

**Ft Lauderdale for Miami/Pitt game 10/13-10/17**

**Charlie Brown picked up Vinnie and I at airport. We stayed at Charlies house two days.**

**Thursday gadgets in his office where I slept for the two days.**

**Sunday day of the game and tailgate. Bill and Jerry talked about my driving in front of tailgate crew. He had never done that before. As we walked into game, some lady from the crowd ask about Cameo. Suspect they were watching us during tailgate. There is no other way she could have noticed us..**

**Baltimore Ravens(09/11/2016) and Redskins games(09/12/2016)**

**Stayed at Sheraton BWI on 09/11/2016 in room #327.**

**Checked in around 8pm. Found gadgets in room. Was**

**later drugged to where my legs were twitching. Got hotel to give me room#233. Gadgets later got into room.**

**Eventually left hotel around midnight. Got a room at Hilton Garden BWI room#245.**

**Somehow gadgets got in the room. Could not sleep due gadgets. Sleep deprived.**

**Gadgets in budget rental car. Took car back to airport.**

**Gadgets installed in new car.**

**How are they getting access to my rooms? What are they telling hotels to act against the own interest? Who could be aiding them in these crimes?**

**New Orleans Hyatt Regency (6/2 thru 6/8 2016) with wife Rochelle on a business trip.**

**Gadget in our room when we walked in. Gadgets in my bed, sticky substance in my tee shirts. Shirts just got out of cleaners the day before with sticky substance.**

**Hotel security commented about the smell of my cigar while in smoking area. 278)**

**Participant**

**Rebecca Emerson approached me outside in smoking area. We hung out all night/morning in smoking area talking and walking to store.**

**What did they tell Hyatt to convince them to violate their guest privacy and let them to install cameras and gadgets?**

**How did they gain access to our room while we were there?**

**More importantly, who is orchestrating these events and why?**

**Dominican Republic(5/26 thr 5/31 2016)Cameo  
Santiago Aloha Del Sol hotel(Cameo). Hotel asked about my cigars and being watched while smoking. Stood in front of me while I smoked my cigar.**

**Hotel Riazor(Cameo)  
Key stolen ,paste gadget in room and sleep deprivation in room.**

**Seabreeze Jazz Fest Panama City Beach(4/21 thr 4/25 2016)  
Steve Dickens(IBM),Tiffany, Shelia(met on Supercruise in October 2015),Alisa Meekins (IBM).**

**We stayed at Splash condo on the beach. Sprayed in my back while sleeping in balcony bedroom causing back pain. Sleep deprived all night.**

**How did they gain access to my room to install gadgets and cameras? What did they tell the condo management about me to convince them to allow autonomous access to a**

**guest room? 289) More importantly, who is orchestrating these events and why?**

**DC fishing trip 07/29 thru 08/1 2016(Cameo)**

**Checked into Doubtree Hotel BWI. Gadgets in rooms shared with Cameo.**

**How did they gain access to my room to install gadgets and cameras? What did they tell the hotel management about me to convince them to allow autonomous access to a guest room?**

**More importantly, who is orchestrating these events and why?**

**At Sheraton Old San Juan, PR for Super Cruise 10/20/2015 (Steve Dickens IBM)**

**Gadgets in room.**

**How did they gain access to my room to install gadgets and cameras? What did they tell the hotel to convince them to allow autonomous access to a guest room?**

**More importantly, who is orchestrating these events and why?**

**Capital Jazz Fest Super cruise (Steve Dickens IBM)10/21  
thru 11/1 2015**

**Fest security watching me while I smoke my cigars on deck.  
Gadgets in cabin shared with Steve Dickens. Water sprayed  
on me while in bed while Steve slept in his bed. Sleep  
deprived all multiple nights**

**How did they gain access to my cabin to install gadgets and  
cameras? What did they tell the Capital Jazz and or Carnival  
cruise to convince them to allow autonomous access to a  
guest room?**

**More importantly, who is orchestrating these events and  
why?**

**Ilse of Verde,PR 304) Hampton Inn(11/1/2015) 305)  
Gadgets in room.**

**How did they gain access to my room to install gadgets and  
cameras? What did they tell the hotel about me to  
convince them to allow autonomous access to a guest  
room?**

**More importantly, who is orchestrating these events and why?**

**MGM Grand Vegas(9/26 thru 10/2 2015) with wife Rochelle on business trip.**

**Gadgets in room, hotel security watching me, bartender taking my card out of site.**

**How did they gain access to my room to install gadgets and cameras? What did they tell the hotel about me to convince them to allow autonomous access to room?**

**More importantly, who is orchestrating these events and why?**

**Spirit flight from ATL to Atlantic City, NJ**

**My seat and wife seat were rocked back and forth from behind and I was drugged on plane.**

**Who occupied seats behind me on that flight?**

**Atlantic City Tropicana Casino Hotel 8/6 through 8/10 2015 with wife Rochelle for family trip with her parents and her sister.**



**Gadgets in room. Sleep deprived multiple nights.**

**How did they gain access to my room to install gadgets and cameras? What did say to hotel security about me to convince them to allow autonomous access to guest room?**

**More importantly, who is orchestrating these events and why?**

**Falcons last home pre-season game 08/30 2015(Cameo and his tailgate crew)**

**Rick had tickets for the game. Offered me one. On my way to his house, my car seat heater came on injecting some type of drug into my system. Causing me to feel confused. I lost concentration for a couple of seconds.**

**Finally got to his house. Found two others who needed a ride to stadium so Rick offered my services. While I was driving to the stadium, the two friends were observing my driving habits.**

**At the stadium, I was being watched by the tailgate crew. Later, I noticed my nose kept running for no obvious apparent reason. I couldn't get it to stop. Suspect drugging earlier caused my nose to run.**

**Goons were there observing their handy work along with tailgate crew.**

**The goons have been working Cameo, his tailgate crew, Charlie Brown Vinnie and Ty to defame and torture an innocent man. Not sure what they got on them to persuade them to assist in the hoax.**

**More importantly, who is orchestrating these events and why?**

**DC fishing trip 7/18 thru 7/21 2015 Cameo**

**Embassy Suite BWI. Gave Cameo the bedroom earlier.**

**Came back to room Cameo was sleeping on couch. Later noticed gadgets in room. Sleep deprived multiple nights.**

**A girl from Philly approach me while I was smoking a cigars. She was in town for a family reunion.**

**How did they gain access to my room to install gadgets and cameras? What did they tell the hotel about me to convince them to allow autonomous access to a guest room?**

**More importantly, who is orchestrating these events and why?**

**Took greyhound bus from ATL to Birmingham, AL. 7/12 2015. Left ATL at noon. Arrived in Birmingham around 4pm. Didn't tell no one where I was going. I suspect at least three followed me on bus.**

**When leaving bus station, I noticed I was being watched. Suspect Birmingham Sherriff Department had been called about me being in town. Walk to a restaurant. Had a beer and had restaurant call me a cab. Syrian Yellow cab driver showed up to take me to a hotel. He asked a lot of strange questions about what I was doing there. How long was I staying. What I did. Mostly in a interrogative tone. As if someone told him I was there with bad intensions. What did they tell him about me? . Strange.**

**I registered in Laquinta Inn Homewood,Al 7/12 2015. Walked to Landry's Restaurant for dinner. Suspect they**

were in there watching me. As I walked back to hotel, I was shot in my back by a gadget .

Got back to hotel . I noticed Birmingham Sheriff car in lot. Got in room. Called cab to take me to Walgreens. Either African or Caribbean Yellow driver showed up. Back seat was loose so I slipped down in seat. Where I was poked and drugged on the way back to hotel.

Got back to hotel room Gadgets were in room. Sleep deprived all night.

How did they say to gain access to my room to install gadgets and cameras? What did they tell the hotel to convince them to allow them autonomous access to guest room?

More importantly, who is orchestrating these events and why?

Hampton Inn Buford Hwy ATL 06/2015. Needed a room to make calls to a lawyer or private investigator

Started day at LA fitness Buckhead ATL. Left my bag,phone and mp3 player in locker locked. Took subway train Brookhaven and bus to Doraville and walked to hotel.

**Tried checking into hotel but girl at desk said room wasn't ready yet. Waited one hour before they gave me key to room. Got in room and noticed gadgets were there. Tried calling lawyers I looked up earlier at guest computer. Got someone who didn't sound like a lawyer. Why would Hampton Inn allow them to intercept my phone calls through their phone system.**

**What did they say to gain access to my room to install gadgets and cameras? What did they tell the hotel about me to convince them to allow autonomous access to a guestroom?**

**More importantly, who is orchestrating these events and why?**

**Seabreeze Jazz Festival 04/2015 (Steve Dickens IBM)  
Stayed at Tidewater condo. Kept telling us room wasn't ready when we arrived. Didn't get into room until 6pm. Got in room. Noticed gadgets in bunk bed room. Sleep deprived multiple nights. Room key got stolen twice while I was there .**

**Reported stolen key to Panama City Beach authorities and Tidewater security.**

**Brother Ron came in from DC with his girlfriend. The stayed a couple days with us.**

**How did they gain access to my room to install gadgets and cameras? What did they tell the condo management about**

**me to convince them to allow autonomous access to a guest room?**

**More importantly, who is orchestrating these events and why?**

**In Miami for Dolphins football(11/15/2015)**

**Thursday night stayed with friend Charlie Brown house in Ft Lauderdale, FL . Gadgets in bedroom I slept in. Next day, was asked how I slept jokingly. Vinnie asked for cars keys for no reason.**

**Friday moved to Hyatt Regency downtown FT Lauderdale for weekend. Gadgets in bedroom that Vinnie and I shared.**

**Sleep deprived while Vinnie slept in his bed.**

**How did they gain access to Charlies house and hotel room to install gadgets and cameras? What did they tell the hotel management about me to convince them to allow autonomous access to a guest room?**

**The goons have been working Cameo, his tailgate crew, Charlie Brown Vinnie and Ty to defame and torture an innocent man. Not sure what they got on them to persuade them to assist in the hoax**

**Participants**

**Cameo, Vinnie, Charlie, Bill and Jack.**

**Bars and restaurants where hoax has plaid out.**

**Toco Mac Dallas Hwy Marietta,GA(primary suspect of hoax)**

- 306) Liz-bartender**
- 307) Eric- bartender**
- 308) Derrick-manager**
- 309) JC-kitchen manager 362) Mark Steele-patron**
- 363) Bart-neighbor/patron**
- 364) Keith (Tyrone) Gates**
- 365) Brad-patron**
- 366) Brit-patron**
- 367) Nick's Greek restaurant Whitlock Ave Marietta, GA**
- 368) Fargo-bartender**
- 369) Betty-Bartender**
- 370) Carlos-bartender**
- 371) Nicky-bartender**
- 372) Kim-bartender**

**373) Doc's Bar and restaurant Smyrna, GA**

**374) Dave-manager**

**375) Ellen owner of Doc's**

**376) Christen bartender at Doc's**

**377) Lisa bartender**

**378) Clifton patron**

**379) Gus patron**

**380) AB a patron(worked for IBM)**

**381) Mark Steele-patron**

**382) Keith (Tyrone ) Gates**

**383) Dugans Bar Ponce Deleon Atlanta, GA**

**384) Forbes-bartender**

**385) Monday morning bartender**

**386) Sports Grille Austell RoadAustell,GA**

**387) Vinnie-patron**

**388) Little Vinnie-patron**

**389) Karen-bartender**

**390) Red Lobster Austell ,GA**

**391) Dee –bartender/manager**

**392) Participants**



- 393) Steve Dickens (IBM) 919-247-3716. Primary participant at work, vacation. Knows who is doing hoax and cameras in my house, knows gadgets in my hotel room etc..
- 394) Bill Taylor (IBM) 770-329-1544 Primary participants at work, vacation, Knows about cameras in my house,
- 395) Alisa Meekins(IBM)678-481-6622. \*\*
- 396) Lonnie Arbuckle(IBM/LA fitness)Primary participant in hoax. Knows who doing,that they are in my house with cameras,GPS my car..etc
- 397) Jeff(IBM/LA fitness)Primary participant in hoax daily. Knows who is doing it,that they are in my house with cameras,GPS my car..etc\*\*
- 398) Ed(manager IBM) 678-640-9736 Toco Mac
- 399) Hiawatha Anthony(manager IBM)
- 400) Diana Olson(IBM manager)
- 401) Gerald Miller(IBM/team lead)
- 402) Scottie White(IBM)919-264-8209
- 403) Fred(IBM) 845-464-7517
- 404) Tyrone Mcdowell(Devry/DC)443-570-6701. Got in trouble with law a couple of years ago. Agreed to cooperate with hoax. Known for over 30 years.
- 405) Walt(DC) 202-425-4080\*\*
- 406) Cameo(high school buddy) 770-329-4533. Got in trouble with law years ago. Agreed to cooperate with hoax and included tailgate friends to help out. Known for almost forty years. 407) Bill(Atlantic City) 609-233-3917\*\*
- 408) Vinnie(high school buddy)678-437-2723. Got in trouble with law. Agreed to participate with hoax. Also, enlisted friends to help out with hoax. Known for over forty years.

- 409) Charlie Brown(high school)754-422-4438\*\*
- 410) Anthony Robinson(high school) 843-819-0651\*\*
- 411) Jackie Boy(high school) 843-471-9325
- 412) Smitty(barber) 843-744-6951\*\*
- 413) Bart(neighbor) 770-713-3373
- 414) Kim(barber) 678-873-2590
- 415) Jenard Wright(brother)
- 416) Ronald Cooper(brother)
- 417) Tyrone Starwood(trainer Midtown)
- 418) Jason(trainer Midtown)

**Police Report Plaintiff Filed with Cobb**  
**County about Defendants having**

## INCIDENT/INVESTIGATION REPORT

Cobb County Police

Case # 15-032511

Status Codes 1 = None 2 = Burned 3 = Counterfeit / Forged 4 = Damaged / Vandalized 5 = Recovered 6 = Seized 7 = Stolen 8 = Unknown					
	IBR	Status	Quantity	Type Measure	Suspected Type
D R U G S					
Assisting Officers					

Suspect Hate / Bias Motivated: *NONE (NO BIAS)*

## NARRATIVE

I met with Darryl Wright at his home, 265 Lynshire Ct. He stated that over the last year he believes that unknown forces placed a device in his basement to cause him to be sick. He stated that his nose runs and he gets headaches and numbness in his face. He stated that he went to the hospital, saw his doctor, and went to a neurologist last week and they could not find anything wrong with him. He said that he also thinks someone put a gps tracker in his car to track his movements. He stated that there is no reason for someone to have issues with him but he believes that the corporation that runs Taco Mac restaurants is behind the devices. I asked if he has located any devices and he stated that he has not, but he continues to look.

His wife, Rochelle, was home and I asked her if she had any of the same concerns that Darryl did. She told me she doesn't go to the basement so she hasn't felt anything. I asked if Darryl was on any medications and they said no. I asked if he was under any psychiatric care and he is not.

I advised Darryl that the most important thing was for him to get help from the doctors and get a proper diagnosis for what's causing the symptoms. I told him that if he locates any devices he should call us back and we would investigate further.

INCIDENT DATA		INCIDENT/INVESTIGATION REPORT				Case# 15-032511	
						Date / Time Reported 04/12/2015 09:15 Sun	
Agency Name Cobb County Police		ORI GA 0330200				Last Known Secure 04/12/2014 09:15 Sat	
Location of Incident 265 Lynshire Ct, Marietta GA 30064-		Premise Type Residence/home		Zone/Beat F, 513		At Found 04/12/2015 09:15 Sun	
#1	Crime Incident(s) Person Down/person Injured/emotionally Disturbed Person - 9021	(Com)	Weapon / Tools		Activity		
			Entry	Exit	Security		
					Activity		
#2	Crime Incident	( )	Weapon / Tools		Activity		
			Entry	Exit	Security		
					Activity		
#3	Crime Incident	( )	Weapon / Tools		Activity		
			Entry	Exit	Security		
					Activity		
MO							
VICTIM	# of Victims /	Type: INDIVIDUAL( NON LE)		Injury:		Domestic: N	
	V1	Victim/Business Name (Last, First, Middle) WRIGHT, DARRYL EVERETT		Victim of Crime # 1	DOB 12/19/1963	Race B	Sex M
	Home Address 265 LYNSHIRE CT SW, Marietta, GA 30064-		Business Phone		Home Phone 770-499-2245		
	Employer Name/Address		Business Phone		Mobile Phone 404-307-5334		
OTHERS	VVR	Make	Model	Style	Color	Lic/Lis	VIN
	CODES: V- Victim (Denote V2, V3) O = Owner (if other than victim) R = Reporting Person (if other than victim)						
	Type: INDIVIDUAL( NON LE)	Injury:					
	Code IO	Name (Last, First, Middle) WRIGHT, ROCHELLE L		Victim of Crime #	DOB Age 30	Race B	Sex F
INVOLVED	Home Address 265 Lynshire Ct Sw Marietta, GA 30064		Business Phone		Home Phone 770-499-2245		
	Employer Name/Address		Business Phone		Mobile Phone 404-842-8235		
	Type:	Injury:					
	Code	Name (Last, First, Middle)		Victim of Crime #	DOB Age	Race	Sex
PROPERTY	Home Address		Business Phone		Home Phone		
	Employer Name/Address		Business Phone		Mobile Phone		
	1 = None 2 = Burned 3 = Counterfeit / Forged 4 = Damaged / Vandalized 5 = Recovered 6 = Seized 7 = Stolen 8 = Unknown						
	(*OJ = Recovered for Other Jurisdiction)						
PROPERTY	VI #	Code	Status Frm/To	Value	OJ	QTY	Property Description
Officer/ID#		BONNER, S. T. (NLE, NLE) (0042)		Supervisor		MASON, K. B. (NLE, NLE) (0081)	
Invest ID#		(0)		Case Status		Exceptionally Cleared	
Complainant Signature		Case Status		Exceptionally Cleared		04/13/2015	
Status		Complainant Signature		Case Status		Exceptionally Cleared	
R_CS1 IBR		Printed By: TISDAC, 6122		Sys#: 253637		Page 1	
						01/28/2020 08:44	

**Sheraton**

1 message

James Simmons &lt;jaysimmons@gmail.com&gt;

To: James Simmons &lt;jaysimmons@gmail.com&gt;

**Spied on at three Sheraton Hotels four times**

To whom it may concern,

My name is Darryl Wright. I live in Marietta, GA. I am 54 years old man. I have been working married for 30 years. I have two adult children who are college grads. I have never been arrested.

For the past decade I have been hounded by a detective agency that has created a fictional surveillance in my home, my car, at hotel rooms, restaurants and at work.

To maintain this sustained surveillances, they have created a fictional character used to commit crimes in a hotel. The local authorities then convince the hotel to give them total access. Once they have access, they plant hidden cameras and gadgets in my room used to let me know when they are there.

They have used this process many times over the years. Most times, I stay at a hotel once a month. I have no privacy. No crime is never committed so no foul for the local the authorities. These tactics work. It travels well. They are very good lies.

However, my privacy has been repeatedly violated over the years.

For your Sheraton hotels this has happened four times at three locations.

On January 4, 2018, I checked into the Sheraton Santo Domingo room #620 under reservation for George Washington Avenue Santo Domingo, 102-05 Dominican Republic.

Gmail - Sheraton

<https://mail.google.com/mail/u/0?ik=75f875abc>

I left my room to purchase toiletries. When I returned, I was being pounded with water paste shots to my shoulder.

This happened at this same hotel in August of 2017. I checked in on Aug 30 and checked out on Sept 4th 2017. I was there for a vacation.

It happened at the Sheraton Baltimore Washington International Airport on Sept 2016. I came to town for the Baltimore Ravens/ Buffalo Bills football game. I later checked out and checked into BWI Doubletree where the same tactics were used.

This happened in October of 2014 at Sheraton Old San Juan where I stayed days before a Carnival's cruise.

I am writing to let you know what's happening to me at your hotels. You are not the only hotel they have used.

Gmail - Fw: Marriott Customer Care Issue - Darryl wright --&gt; - 19...

<https://mail.google.com/mail/u/0?ik=75f875abc4&view=pt&search=...>

I was there for vacation.

It happened at the Sheraton Baltimore Washington International Airport on Sept 2016. I came to town for the Baltimore Ravens/ Buffalo Bills football game. I later checked out and checked into BWI Doubletree where the same tactics were used.

This happened in October of 2014 at Sheraton Old San Juan where I stayed days before a Carnival's cruise.

**ul**  
**access**  
**to his**  
**home:**  
**419)**

**424)425)426)427)**

**428)Other Contemporary Notes by Plaintiff**

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Spirit on at ~~four~~<sup>three</sup> Sheraton location 4 times

On January 4<sup>th</sup> 2018 I checked into Room 620 Sheraton Santo Domingo in Dominican Republic. My room ~~sampled~~<sup>had</sup> hidden cameras allowing a private detective group to spy on me. That group also enlist a DOMINICAN woman name Yessie to ~~protect~~<sup>befriend</sup> me.

To Whom it may concern;

My name is Darryl Wright

I live in Marietta GA.

I am 54 years. I never been arrested

therefore I ~~and do not~~<sup>do not</sup> have criminal record

I have been married for 30 years

with two young ~~ad~~<sup>to the same woman</sup>

We are blessed to have two young adult who both graduate from college

I have worked for my company for 34 years

for past decade I have been hounded by a detective who has been ~~follow~~<sup>follow</sup> me telling many lies about. They were

hire by my employer IBM

To keep ~~me~~<sup>me</sup> I have been under

24/7 surveillance to my home, car, work, to prevent me from

may All my ~~things~~<sup>things</sup> (both cell and home) have been monitored

laptop and home network have been hacked

To maintain this ~~they~~<sup>surveillance</sup> they have create a fiction

in ~~my~~<sup>my</sup> ~~computer~~<sup>computer</sup>

7/29/2017 Continue...

torture until 04:30 AM. Never could

[illegible]

447)448)

**449) 450)**

7/27/2017 Thurs

Was woken up at 12:30 AM while sleeping  
on my couch in my media room. Was tortured

7/7 207 Friday

7/7 2007 ~~Thurs~~ <sup>Fri</sup> Trip to African American Museum with me and Corrie

We got up around 6:00 am. I eat breakfast at Double Tree restaurant. Cancun was



(3) Boat leaves around 1:50 PM. We catch lots of fish. Filled with my epopro. Around 5:30 I start to drink and smoke <sup>cigar</sup> cigar. Captain Brian ask for a cigar. He had never asked before. Gave him the cigar Bill gave me. We leave Solomon Island around 7:00. Arrive at hotel around 9:00 PM. Put on different clothe. No shower taken suggested by cameo. Walk down Lombard Street towards Inner Harbor. As we approach Inner Harbor, Girl shakes her breast at me. I thought that was strange. Just suspect she was trying to sell her body. Enter Chesapeake factory. This guy who I didn't know tap cameo on his back. He didn't response. While in Chesapeake I see him a number of times. In the bar and other areas of the restaurant. I sit at the bar to begin to order. Cameo calls me to say he is upstairs at Uno. We order and eat at Uno's Pizzeria. We head back to hotel. Notice girls on Pratt Street. I suspect they are selling their bodies at 1:00 AM or in the morning. We get back to room. Cameo falls to sleep immediately. I put on my nighties and smoke a cigar outside hotel porte. Walk back to room and fall asleep. Noticed GAD in bed.

7/9/2017 Sunday Ty and Allison  
 Arrive at Mill return to hotel from his sister's house. I'm walking on-tried mill on L of hotel. Cameo taking shower. We leave at 12:15 for Ty's house. Nothing extraordinary happen while there. We leave around 10:00 PM.

④ We get up to room. Bill left something in car. Chino and Bill go back down. I get into my nighties and make me a drink. Checked for my cigars. Found none. I did put my cigars in my bag before we left the car. So I go back to garage to check car. None were in car. Came back to room. Bill and Chino asked if I went back to car for cigars. Not sure how they know that since they weren't there. I said yes. Checked my bag. Cigars were there this time. Got the impression someone wanted me to go walk street to car. Once more.

Took my drink and cigars down to hotel portal. Saw a guy just sitting there doing nothing. Noticed him before when I went to the car. Sat near him to smoke my cigar. After lighting cigar and smoking he gets up and walk in front of me then disappears.

Later someone from hotel comes out and pushes vacuuming rug near me. Strange for 12:00 midnight. I smoke a little more. Head back to room. Came and Bill still cloth. I jump in bed.

7/10 ~~the~~ 2017 Monday. We leave for home

Get home safe after take <sup>train</sup> taxi to Art Station and 6. Get to Marietta. Uber to home using taxi driver Jeffrey in Hyundai Elantra D11692. He asked a lot

452)453)

09/28/2018

At home in media room

Woken up at 3:30 AM. Tortured with debris flying around. Around 5:00 I was grunting for

**454) 455)**

7/03/2017 Woke up around ~~on~~ my basement media room  
Monday couch with my legs ~~stirring~~ and stinging

~~Got to work~~ Was assaulted while driving into  
work with substance in my underwear  
and my back.

Fibs like small bubbles bursting on  
abdomen

7/4 Couch IP Cam stopped recording at  
03:44 AM. Was woken up around  
06:15 am. Torched from 06:15 - 07:15 on  
my couch. feet throbbing. Pant sprayed on  
my <sup>leg</sup> back shirt and underwear while on  
couch

~~IP Couch IP Cam start~~

Entered LA fitness around 09:30. Worked  
out on tread mill to around 10:40 am. Noticed  
my cell phone had "no service" for about  
40 mins until I left the gym. ATT (611) says  
there was no tower power that prevented service

IP Couch cam start working at 17:23 and stopped  
at 21:59.

7/5 NO IP couch cam starts since 21:59 7/4  
~~was torched while he~~  
was awake around 02:15. Torched until  
LA are leaving for LA fitness

08/16/2018

## - At LA fitness

- Worked or walked 5.5 miles, saw mama on back mach.
- Always some commands on my bag as being bigger locker
- Left (for <sup>one</sup>) fine wine. Bought cigar and rum
- Came home to drop off sweaty cloth and get evidence. (cigar <sup>smoke</sup> + hat)
- took evidence to bank credit union, talked to tell sister <sup>brother</sup> about loan issue while in vault.
- Went to Apple Store to fix my iPhone landscape issue. Talked with Aze, about laptop cheap for Michael.
- Hung out at Doc's. Brother, asked me to watch his laptop as he walked out <sup>in chair</sup> and used his cell phone. <sup>I asked</sup> asked bartender to also watch laptop. <sup>remembered</sup> remembered sister <sup>commands</sup> that he is always on his phone bar? with Doc's owner. Talked to Ty while in Doc's about NISIAN and coming to ATL. NISIAN looks fat and disturbed. <sup>about</sup> ~~brother~~ boyfriend and husband got her hooked on drugs. Also talked about BMW problems over cell. Brother was outside while I left. Drinks were strong. She watched me at bar watching laptop. <sup>she</sup> ~~she~~ says hello as I walked into Doc's. Two guys sat at table near door <sup>while</sup> looks similar to other events at Doc's, as if to arrest him as I leave or steal something.
- Left Doc's for home. Drove back roads to Windy Hill to home.
- Got home. Drunk and ate, ~~fall~~ smoke cigar and fell asleep. Vinnie text me that he is at the Grill. Called said it was ~~Ron~~ ~~the~~ ~~Jerome~~ birthday. ~~Jerome~~ stood between Jerome and Vinnie near Randy and Terrence

While at work got gas and cramps. Around 4 pm, more gas and cramps.

08/22/2017 Tues

Drove into work from home was plastered with paste to my back. Also substance applied to my underwear causing gas. Ran into Scott after my walk while sweating from the walk. Stw h.m. near bathroom. J. talked about Darkhead Court

08/23/2017 WED

WAS WOKEN UP @ 12:30 AM being tortured with paste balls sprayed on my back, Airshot to my feet under my comforter blanket. Drove to gym, was douse with substance causing gas while I worked out on treadmill. While driving into work was plaster through my back shirt with paste WAS Douse with substance causing gas.

459)460)

\* He orders wings then got outside with Tim. He ask that I stay at the bar while he give Tim his V's outside. He

**461) 462) 463) 464) 465) 466) 467) 468) 469)**







## **A Civil Racketeering Influence Criminal Organization ("Federal and Georgia RICO")**

**1.44**

## **Organized Fraud on the US justice system, plaintiff and family**

**1.45**

Plaintiff is here to sue defendants for injunctive relief from a 16-year criminal crime wave surrounding plaintiff and family brought upon by RICO defendants IBM and Taco Mac law firm's lawsuit prevention protection racket service. And we will soon be seeking damages cause by the mob organize crime services they deployed to discourage, delay and thwart plaintiff's lawsuit and prevent plaintiff from acquiring the proper counsel for the lawsuit. This is a complaint about greed, criminal and unethical behavior using a criminally constituted enterprise solely to prevent or delay lawful lawsuits. Every American should be disturbed about this illegal service being marketed in the United States against Americans. It's a monster to those who believe that the US justice system is fair to everyone and are not truly familiar with its procedures, rules and idiosyncrasies. We are here because of criminal fraudulent behavior.

**1.46**

As the court will see, defendants collectively spent a lot of money, used some of their own employees and committed a lot of crimes to keep plaintiff from the courthouse. Fortunately, in America all corporations (public or private), has to account in some way for how they make their money and how they spend their money. This is not a like a CIA budget where money is dumped in with no tally sheet produced. Defendants spent a lot of money over years to disrupt plaintiff and his family lives. Plaintiff's team will be looking at the accounting of this money spent as to why corporations and its co-conspirators would spend so much money to prevent lawsuit by plaintiffs who posed no threat to the defendants. What is the reason to unlawfully surveil an innocent family 24/7 for years with no evidences of a crime or infraction? There will be no credible answer to this complaint by defendants except greed and that they could ultimately get away with fraud as long as the money continues to flow unabated.

1.47

RICO primary defendants IBM and Taco Mac has finance and unleashed a Professional Criminal Enterprise(PCE) lawsuit prevention protection racket on plaintiff and his family to prevent plaintiff from accessing counsels of his choice in a timely manner. PCE clients collectively have limitless funds to sustain this illegal racket. For plaintiff, it has been 16 years which is 28% of plaintiff's life he and his family have endured irreparable harm by the hands of RICO defendants.

The Profession Criminal Enterprise overwhelms local or state authorities in most municipalities. They are confident they won't get caught. For the most part, they operate as stealth criminal invaders. They do engage the locals but only if they have too. And when they do, they persuade the authorities or proprietors or managers or corporate officers that plaintiff is a really bad guy and we are here to help you with your new problem. Most of the conspiring defendants know who they are but cooperate anyway. Plaintiff suspects the conspiring defendants use them too, at some point. To defendants this is a necessary service sold by law firms with huge private investigator teams to

**offer their customers with limitless funds. A way to bring in lucrative short-term or long-term revenue streams of business for the firm. A service to illegally tilt the law in their clients' favor forever.**

**1.48**

**Law firms and their clients know and understand what methods are being use. They know, for the most part, criminal behavior will be deployed to prevent lawsuits. Law firms who market this service of a lawsuit prevention protection racket risk being ostracize, sued and partners disbarred if anyone in law federal enforcement or the media finds out that are really perpetrating fraud on the US justice system. They know this service is illegal to sell in the US. They do it for greed only.**

**The professional criminal enterprise sole primary purpose is to deceive everyone about their intentions, stifle any idea of an honest investigation into their criminal behavior even when someone sees a clear crime, PCE convinces them there was no crime since plaintiff is himself a criminal. And when they get caught, PCE discourage, delay and thwart lawsuits until the statute of limitation runs out on their crimes.**

**The Professional Criminal Enterprise can thwart lawsuits in perpetuity with unlawful 24/7 surveillance of plaintiffs, in and around his home, at work, his cars (rented or owned), his rented hotels, cruise cabins, casinos, condos, national parks and LA fitness. They know where plaintiff and family are at all times.**

**PCE primary purpose is to defraud the US justice system and prevent plaintiffs from having their due process in court no matter what the reason**

(good, bad or warranted). PCE has committed many international, federal, state and local crimes against plaintiff such as attempted murder, threats of murder, assault and battery, kidnapping, bribery, mail and wire fraud, blackmail, extortion, torture, home invasion, bank fraud, unlawful spying, computer crimes and many more offences. They simply don't believe they will be caught.

**1.50**

The PCE has stalked plaintiff all over the world using slanderous defamatory lies by creating a fictional character that does not exist and have never existed. Convincing the willing to aid and abet them in their criminal practices from spying on plaintiff, filming plaintiff, drugging plaintiff and torturing plaintiff with unfettered access to plaintiff's rooms and home. PCE actors' film all of their crimes and show them to their clients and conspirators to assure them of their controls and ability. The RICO statue was designed for this type of unlawful criminal enterprise. PCE believe they can get away with lawsuit prevention protection racket crimes.

**1.51**

## **Invasion of Plaintiff's home**

The PCE has invaded plaintiff's dream home for at least eight years where they have spied on him, his wife, his mother, his children and any of his guest. Where plaintiff and wife have raised their son and daughter for 21 years. Both are college grads. One is now a doctor. Egregiously violating an American long-standing right to privacy in one's home.

**1.52**

With PCE's unlawful surveillance of his home, the professional criminal enterprise has tortured plaintiff for years. He has been exposed physical and mental torture such as sleep deprivation and Chines water

torture. He has been restrained in his bed and media room couch and assaulted with feet torture. He is frequently being woken up by the heating of his kidneys and bladder to eventually force him to urinate. Plaintiff suspects PCE is testing him for drug levels in his system during intervals of drugging using his home plumbing system. All done to intimidate him from telling and filing this lawsuit against his former employer and others. In addition, PCE has performed years of psychological torture on plaintiff and his family which has cause physical, mental and emotional damages.

i.53

## **Daily Torture**

Daily drugging causing excessive urinating, bowel movements, eye watering, nose running, headaches, dizziness, coughing, sneezing and hallucinations, drugging of plaintiff and family, unlawful hypnosis of plaintiff and family and other human biological symptoms used to determine if enough drugs have been administered. They can also tell when plaintiff passes gas whether the drug has been fully administered. Plaintiff believe his home plumbing is being monitored by PCE. Plaintiff cigars have been spiked with an accelerant that causes it to burn fast, brightly illuminate with an awful smell. This spiking occurs at home, bars, restaurants, casinos and hotels to convince, whomever is watching, that plaintiff is smoking something that he is not.

i.54

PCE has intimidated or extorted or bribed plaintiff's lifelong friends to assist them in the torturing scheme in their homes. Some of those relationships go back 40 or 50 plus years. After this lawsuit is over, those relationships will be destroyed forever. Very difficult to resurrect those relationships considering the circumstances and pressure they were under to assist PCE at any cost.

1.55

PCE has unlimited and unlawful access to plaintiff's home and cars 24/7. They have bypassed plaintiff's 21 surveillance camera system and ADT

**alarm security system. Three of those cameras are pointed at plaintiff while he sleeps in his media room where most of the torture acts takes place. Plaintiff has not slept a night or day without being watched for 15 years. An innocent man with no criminal record.**

**1.56**

**There are four torture stations in plaintiff's home. His bedroom where he sleeps, his media room where he sleeps, couches in his family room where he watches TV and his car driver side seat. Those same locations are used in hotels, cruise ship cabins, condos and rented cars when he travels also.**

**1.57**

**Plaintiff has recorded two strokes in the past eight years requiring emergency room service. One stroke occurred in IBM's office. The other was in his home. One common theme with those strokes is high blood pressure and plaintiff fainting. Plaintiff has recently acquired persistent high blood pressure measurements since 2019.**

**i.58**

**Plaintiff can't use any of his electronics or computerize equipment in his home. Neither can his wife, who works from home, use any of her company's Anthem electronic or computerize devices or personal devices which all are compromised. Laptops, home phones, cell homes and tablets have all been hacked or compromised. His six-home network have all been hacked. DirecTV network, Swann camera system, ADT camera system, ADT alarm system, AT&T Wi-Fi network, Comcast Wi-Fi network, all have been compromised. Plaintiff has no certainty of his home information system infrastructure to safely and securely get through a pre-trial or post trial.**

i.59

When plaintiff travels inside the US and out of the country, some events plaintiff and family participate in are orchestrated and staged by PCE. PCE travels with a large team of specialist and leaves a large digital and financial foot print. Most times PCE stays in the same hotel as plaintiff and family which require lots of planning and cooperation with the hotels, condos, cruise lines and casinos. Probably using local authorities to convince coconspirators to help them get access.

1.60

With unlawful access to plaintiff's home and his electronics (laptops, home phones, workstations, cell phones etc...), PCE is constantly hacking plaintiff's home, personal and family's electronics. PCE hackers knows when plaintiff leaves/arrives, what flight he or family is on, what hotel they are staying in, what rental car agency plaintiff has reserved a car with and whether plaintiff or family is taking a HUBER taxi ahead of time. PCE has hacked all plaintiff travel APPs too. All electronics are hacked.

i.61

Plaintiff has tried contacting counsels using his home phone many times. Those calls have been intercepted by the same person as a way of saying you don't know who are and you can't stop us. Plaintiff has tried his cell phones. Those calls were intercepted by the same person too at home and away. When plaintiff uses his laptop computers or tablet to research counsels, counsels' websites have been hacked including the FBI's website. When he finds a counsel office address and phone number, the address is false and phone number intercepted. Plaintiff has bought multiple throw away cell phones. Those calls were intercepted too by the same person. At home and away from home. Plaintiff has used hotel's phones. Those calls are intercepted with the cooperation of the hotels



conspirators. PCE has commandeered the hotel's entire telephone and communication systems.

i.62

PCE has hacked the top five law firms in the city of Atlanta websites and intercepted calls to them. Those are King and Spaulding, Alston Bird, Troutman Sanders, Kilpatrick Townsend and Stockton and Eversheds and Southerland. Plaintiff has tried contacting them through their websites, by phone and US mail. Plaintiff has also contacted counsels David Boise, Ben Crum and the Cochran firm through their websites which were hacked and phone calls intercepted. Plaintiff has been to Davis and Bozeman and Morgan and Morgan law firms. Both say they don't handle case like mine. This why plaintiff suspects all large firms use PCEs at times.

1.63

The PCE has turned plaintiff's home and life into a "house of horror" and a "biological experimental lab". Plaintiff home is unusable for pre-trial proceedings, trial proceedings and post trial proceedings. Plaintiff can't sell his home since he would have to disclose all PCE's activities in it for the past 15 years. Also, plaintiff needs to know how PCE is getting in and out his home, where are all of the hidden cameras located, where are all the torture gadgets located, wants to know who are these thugs that have been stalking plaintiff for 15 and who are the neighbors that are collaborating with PCE. Unfortunately, Plaintiff and family will have to relocate to another home and neighborhood for their safety and privacy which will require lots of funds for around the clock safety, privacy and security monitoring system, electronic and computerize equipment (new laptops, new phones, new cell phones) and a network to support the infrastructure for a secured home for plaintiff's family before and after the trial. They have totally destroyed plaintiff's and family's life.

**1.64**

## **Threatening to Kill Plaintiff Many Times since 2018**

**While on vacation in Santo Domingo, Dominican Republic, at the Sheraton Hotel in January of 2018, MLK birthday weekend, plaintiff noticed that he was not just only being spied on, filmed, tortured and drugged but that those filmed incidents were being shown to other girls for coaching and blackmail purposes and possibly worst. The girls who he met on that trip and entertained him meetings were staged. They were reciting quotes from him with past girls and quotes from past girls to him indicating that there was an orchestrated setup in progress in the Sheraton Hotel. There were clips and incidents from previous episodes that were being recreated right in front of his eyes. A sort of like I've seen this movie before. PCE actors were not just performing the usual criminal protocols but staging them with local actors at the Sheraton Hotel Santo Domingo.**

**1.65**

**After returning from his vacation, plaintiff logged onto Sheraton and Marriot website to report a complaint. Plaintiff entered in the complaint with his address and phone number and a suggestion that they could talk about**

plaintiff's experience in their hotels which similar events had happen before. Plaintiff never got a phone call or US mail response from defendants. He did get an email to an email address that he had never given when he logged the complaint and that he had just created months prior. The only time plaintiff used that email address was on his wife company's Anthem laptop the find how extensive their hacking was. He never used that email address any time before.

1.66

A week later, plaintiff later tried complaining through the websites again-still no response from Sheraton or Marriott. However, on January 28th of 2019 plaintiff life was threaten in public at the Kennesaw, Ga Barret Parkway Bahama Breeze while at the bar and in front of at least 8 people who were at the bar or sitting at tables around the bar. The PCE representative said that if I told anyone what had been happening to me he would kill me multiple times and that he was from Mobile Alabama. PCE representative was so loud and boisterous that the bartender called the manager over. She asked if I wanted her to call the police. Without really understanding what had just taken place, I said no. I told her he is probably drunk and I didn't want to get the police involve at the time. PCE representative was there with two other guys who he was buying drinks for. Later, he paid the bill with a credit card and left.

i.67

Since then plaintiff has been threatening in public a total six times in 2018 and eight times in 2019 at his home. Those eight home threats he was restrained to his bed and media room couch while two thugs assaulted him. He was unable to move an inch while being restrained. Two other times he was restrained then foot tortured while being yelled at that I better not tell anyone what's been happening to me. Plaintiff is unable to

determine how they are getting in and out of his home without his camera and ADT alarm system picking them up.

i.68

After making several more attempts to contact Sheraton and Marriott via website and phone, plaintiff sent both a FedEx letter mail of the complaint and that I had been threatened after reporting the Santo Domingo incident via their website. The letter was sent to their headquarters titled **security**-no response.

Wherever plaintiff goes, plaintiff is being tracked using his own electronics and automobiles. Those inside and outside networks are also being hacked such as every hotel, condominiums or resort he frequents, FED-EX, Georgia Department of Labor, Atlanta Library system, Cobb County Library system, Kennesaw State University library and Kennesaw State College of Professional Education computer lab.

1.7

These bold and appalling perpetrators are deliberate lawbreakers who even stalked plaintiff in the Richard Russell building on 10/16/2019 while he was there accessing the US Attorney's office on the 6<sup>th</sup> floor. They also followed him to through the corridors and elevators to the US District Court Clerk's office on the 22<sup>nd</sup> floor. Later from the Cobb county Vining's library, they hacked the FBI's website to prevent plaintiff from reporting their many crimes with in the federal building. Who does this type of surveillance of an innocent man

**in a federal building with its extensive security and ubiquitous cameras?**

**RICO defendants and co-conspirators are used to buying their way to success. Plaintiff and team are here to vigorously argue the merits of this case at trial. We do not want to normalize this criminal behavior by rich and well-heeled defendants in the US justice system. We look forward to an extensive discovery of all defendants and then trial.**

**i.9**

**Plaintiff will be asking for the following subpoenas soon:**

**This court has to understand that these criminals are trained US lawyers, practice US law in front of judges and juries and know**

**all the idiosyncrasies of the US justice system. They are organize criminal perpetrators with a few incentives: avarice greed for perpetual lawyers' fees for them and their firms by using any means necessary to tilt the justice system in their favor and perpetrate fraud on the US justice system. They are, in fact, the perfect organize criminal enterprise who have tentacles in international, federal, state and local law authorities and believe they won't ever get caught using criminal racketeering methods. These lawyers are simply crooks who swore fidelity to the US justice system then got greedy and knowing designed an illegal service to sell to their wealthy clients. We are going after crooked lawyers, their clients and their investigators who execute an organize criminal racket to prevent lawsuits.**

**Plaintiff and family have incurred and is still incurring egregious and horrible irreparable harm by defendants and coconspirators with their organize crime lawsuit prevention protection racket. These subpoena requests are just a handful of other subpoenas to come in hope of uncovering and stopping felony organize crime wave surrounding plaintiff and family.**

**This is a civil lawsuit with organize crime implications by a greedy law firm and their lawyers who are supposed to act like officers of the US court. These requesting subpoenas are designed to get this lawsuit about the lawsuit prevention protection racket to a jury ASAP. The racket services were designed and constituted by law firms and their lawyers with their investigators being the foot soldiers using organize felony criminal tactics to achieve their goal of intimidating, discouraging, delaying and thwarting lawsuits.**

The organize criminal tactics deployed and used are no different than any violent street gang or mob. The criminal racket has been mostly funded by a fortune 500 corporation IBM and Taco Mac using their annual revenues for 16 years. These subpoenas are designed to identify the architects and orchestrators of this criminal enterprise whose primary purpose is to tilt lawsuits in favor for their wealthy clients by defrauding the US Justice system along the way.

## **Subpoena #1**

IBM who has been unlawfully tracking plaintiff and family since at least 2005, invaded plaintiff's home and hotel rooms, condos and cruise cabins when he and his family travels all over the world since 2005.

### **Documents, electronically stored information or tangible objects**

1)Names and notes of all IBM employees who participated in the investigations at work and when plaintiff worked from.

2)Names and notes of all IBM employees who participated in investigations of plaintiff in other places such as LA Fitness,

restaurants, cruises, condos and Kennesaw Battlefield anywhere outside of the workplace.

**3)All communications and documents between IBM representatives and Taco Mac representatives since 2005 such as personnel, dates, times and what were the reasons for the communications relating to plaintiff and family.**

**4)All communications between IBM REPs and RICO coconspirators since 2005. Particularly since November 2017 to September 2020 and the personnel who initiated those communications and personnel who excepted those communications. What were the subjects to those communications related to plaintiff and family?**

**5)The names of all law firms, lawyers and investigators who performed the investigations of plaintiff from 2005 to September of 2020.**

**6)The names of all law firms, lawyers and investigators billing and times sheet from 2005 to September 2020. How much money was spent with those firms to date and for what reason?**

**7)All investigators' field and office notes taken during the investigation of plaintiff and family since 2005 until September 2020. Particularly those taken with co-conspirators personnel.**

**518) All investigators' notes and recordings taken with plaintiff's colleagues, friends, family, neighbors, his family doctors, doctors used to counsel the law firm and their personnel or any person related to the investigation of plaintiff and family.**



**8)A list of all team members used to monitor, spy, film, torture and drug plaintiff and family in their home including the physical locations where those teams were stationed over the years.**

**9)A list of all federal, state and local authorities contacted and used to assist IBM reps in investigating plaintiff-names and titles. We want know what assistance were given by those authorities.**

**10)All names and notes of all team members used to travel to locations where plaintiff was monitored, spied on, filmed, tortured and drugged including passports and hotels where they stayed during offshore investigations since 2005.**

**11)All names of any foreign law firms, private investigators and local authorities used to investigate plaintiff while on foreign soil.**

**12)A list of all equipment used to spy on plaintiff in his home and elsewhere.**

**13)A list of all drugs used on plaintiff since 2005.**

**14)A list of all audio/videos recording taken of plaintiff and family since 2005.**

**15)A list of who those audio/video recordings shown to and why?**

## **Subpoena#2**

**Taco Mac where plaintiff has been unlawfully track, harassed, spied on and assaulted on their premises.**

### **Documents, electronically stored information or tangible objects**

**1)Names and notes of all Taco Mac employees who participated in the investigations of plaintiff on or off of Taco Mac's premises.**

**2)All communications and documents between Taco Mac representatives and IBM representatives. Such as personnel, dates, times and what was discussed since 2005.**

**3)All communications between IBM REPs and RICO coconspirators since 2005. Particularly since November 2017 to September 2020 and the personnel who initiated those communications and personnel who excepted those communications. What were the subjects to those communications related to plaintiff and family?**

**4)The names of all law firms, lawyers and investigators who performed the investigations from 2005 to September of 2020.**

**5)The law firms, lawyers and investigators billing and times sheet from 2005 to September 2020. How much money was spent with those firms to date?**

**6)All investigators' field and office notes taken during the investigation of plaintiff and family since 2005 until September 2020.**

**7)All investigators' notes and recordings taken with plaintiff's colleagues, friends, family, neighbors, his doctors, doctors used to counsel the law firms and their personnel or any person related to the investigation of plaintiff and family.**

**8)All list of the team members used to travel to locations where plaintiff was spied on, filmed, tortured and drugged including passports and hotels where they stayed.**

**9)A list of all federal, state and local authorities contacted and used to assist Taco Mac reps in investigating plaintiff-names and titles. We want know what assistance were given by those authorities**

**10)A list of all equipment used to spy on plaintiff.**

**11)A list of all drugs were used on plaintiff and family.**

**12)All audio/videos recording taken of plaintiff and family anywhere.**

**13)Who were those videos shown to and why?**

### **544)Subpoena #3**

**BWI Double Tree by Hilton where plaintiff was spied on, filmed, drugged and tortured during the 2019 labor day weekend for four days.**

### **Copy of evidence preservation letter sent toHilton and PMD I,LL after the incident in August of2019**

**09/07/2019**

**On August 30,2019, Darryl Wright checked into the BWI Doubletree Hilton at 890 Elkridge Landing Road Linthicum, MD 21090-2093**

**He was given room#462.**

**While in room 462, Darryl was spied on, drugged and tortured while in bed. Every night for four days.**

**This is not the first time at a Hilton property that similar events have happen.**

**For the coming litigation purposes, Mr. Wright and team would like you to preserve:**

**1)All the property's surveillance video/audio from 4PM 08/01/2019 to 06AM 09/03/2019. Both inside, outside, around the entire site, 4th floor and room 462 24/7.**

**2)Were there other groups on the property using video and audio devices during my stay.? If so, preserve all photographs, videotapes, audio or computer generated media.**

**3)We would like you to preserve a list of all hotel guest from 09/01/2019 to 09/03/2019. We want to know who paid for their stay, how long they stayed and what company they worked for.**

**4)We would like you to preserve a list of all employees/contractors, and their address and phone numbers who work on the premises from 08/01/2019 to 09/03/2019. That ranges from Hilton corporate officers, to hotel managers to janitors or housekeeping to bus drivers during 08/01/2019 to 09/03/2019.**

**5) Anybody who worked on the premises 24/7.**

**6)Preserve all corporate computer electronic emails, hotel phone logs, corporate cell phones, instant messages and text messages for 08/01/2019 to 09/03/2019,**

**7) Preserve a list of all managers corporate or local who worked on the premises from 08/01/2019 to 09/03/2019.**

**8) Preserve all computer electronic emails, phone logs, cell phones and text messages related to communications with the local, state and federal authorities between 08/01/2019 to 09/03/2019.**

**9) Preserve all communications emails, phone logs, instant messages and text messages between Hilton security officers or corporate lawyers or any other lawyers or private investigators during 08/01/2019 to 09/03/2019.**

**Questions to be discussed during initial disclosure:**

**1) Did anyone stay at the BWI Doubletree who did not register during 08/01/2019 to 09/03/2109?**

**2) What party or parties assured Hilton that it was okay to allow crimes against Mr. Wright at the hotel and that there would be no exposure to criminal charges and or a civil lawsuit?**

**3) What parties participated in the agreement?  
When did the negotiations take place?**

**4) How were the negotiations done ie: in person, through phone calls, conference calls, emails, cell phones, text..etc**

**As I was leaving the hotel, asked the front desk person Simi for my receipt. She told there was no receipt since the bill was not paid by me. It was paid by Expedia. I was told to ask Expedia for my receipt. She said the only record that I stayed at BWI Doubletree was my credit card on file and \$200.00 incident charge that would be gone in 3 business days. Two days later, I called to have my bill emailed to and was told the same excuse. I have stayed at many Hiltons and have never heard of this excuse before. Was there an attempt to erase my stay at BWI Doubletree-a cover up?**

**Additional questions since the incident of  
August 2019 Labor Day weekend:**

**1)Has there been any investigations of plaintiff assertions since September of 2019?**

**2)Who conducted the investigations?**

**3)Has there been any communications between coconspirators Hilton or PMD I, LLC and IBM or Taco Mac Reps about the investigations or its results?**

**4)Who were the personnel involved in the communications of the investigations?**

**5)Were the results of the investigation disseminated to any other co-conspirators or parties related to this lawsuit?**

### **Subpoena#4**

#### **Copy of evidence preservation letter sent to US Marshals after the incident in Richard Russell Federal Building**

**574) US Marshal Office for video of a stalking incident on 10/16/2019 while plaintiff was accessing the US Attorney's office and US Court Clerk:**

- i. UNITED STATES DISTRICT COURT**
- ii. NORTHERN DISTRICT OF GEORGIA**



**1.1:19-CV-5213 WMR iii.  
75 Ted Turner Drive, SW  
Atlanta, GA 30303-3338**

## **Evidence Preservation Letter**

**Northern District of Georgia (N/GA)  
U.S. Marshal Federal Building  
75 Ted Turner Drive SW, Room 1669  
Atlanta, GA 30303  
(404) 331-6833  
10/22/2019**

**To whom it may concern with building security:**

**My name is Darryl Wright. On 10/16/2019 I was stalked in the  
Richard B. Russell building by representatives working for my former  
employer IBM. They were told not to track me. I was tracked throughout  
building. Even in the elevators.**

**I am asking that you preserve video of the 1<sup>st</sup>, 6<sup>th</sup>, 7<sup>th</sup>, 5<sup>th</sup> and 22<sup>nd</sup>  
floors for that day until we can subpoena the evidence. I  
was there between the hours 9:00am to 10:00am. I would  
like to have the entire day footage preserved.**

**Additional questions since the incident of  
October 2019:**

**1)Has there been any investigations of plaintiff assertions since October 2019 incident?**

**2)Who conducted the investigations?**

**3)Has there been any communications between coconspirators Hilton or PMD I, LLC, IBM or Taco Mac Reps about the investigations or its results?**

**4)Who were the personnel involved in the communications of the investigations?**

**5)Were the results of the investigation disseminated or shared with any other co-conspirators or parties related to this lawsuit?**

**Subpoena#5**

**US Marshal Supervisor Santez Kildred who plaintiff suspects knows exactly who the perpetrators are and their methods. There is no way PCE can stalk someone in a Federal Building with cameras everywhere and the US Marshal not know who they are.**

**Plaintiff Darryl Wright is asking for the following data from 10/22/2019.**

**All personal cell phone data including phone records and text from 10/22/2019.**

**All work cell phone data including phone records and text from 10/22/2019.**

**All work phone data land line data from 10/22/2019**

### **Subpoena#6**

**Dave and Bozeman law firm where plaintiff was filmed by a paralegal during an interview on 10/11/2018. Plaintiff seeks to**

validate what he is saying to the court now. If plaintiff was video then he has privilege of that video.

My name is Darryl Wright who is suing my former employer. On 10/11/2018, I was in search of a lawyer. I found two on the internet and saw you and Ben Crump on TV representing other clients. Your law firm was one and Ben Crump was the other I searched out for. The address for you was listed as 4157 Flat Shoal Road Decatur, Ga Building suite #330 and the local address for Ben Crump (whose real practice resides in Florida) but the internet listed his Atlanta practice at 191 Peachtree Suite 4200.

When I arrived at 191 Peachtree Suite 4200, the banner and secretary says it was the law office of Morgan and Morgan. I asked if Ben Crump practiced there. The secretary said he does and suggested I use a conference room to call into their call center to discuss my case so someone could assign me the correct lawyer. I declined.

Later, I drove to your practice at 4157 Flat Shoal Road Building C office#330 where I interviewed with your paralegal about my case. The office appeared genuine with secretaries and a guy leaving in a wheel chair. The office had your banner "Davis

**Bozeman Law Firm." I sat down with your paralegal in a room where the door sign says that video would be taken during interviews.**

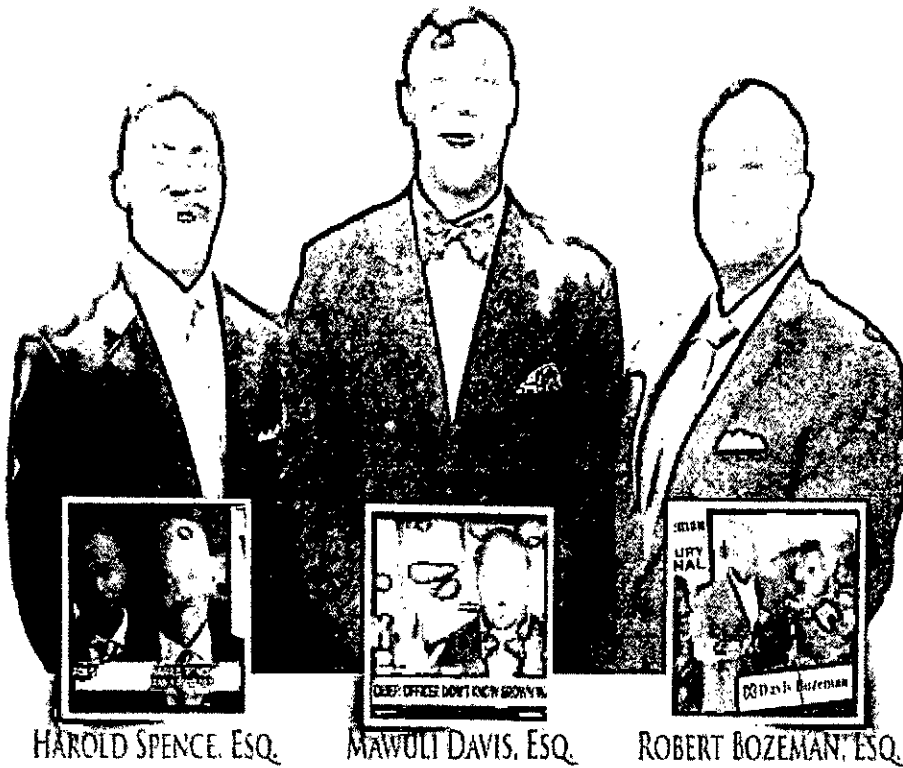
**She looked professional, gave me a Davis and Bozeman plantlet and asked if I wanted water. Your picture was on the plantlet and there was a lot of information about your law firm and its history. As we began to discuss my case, she started taking notes. After about one hour and 15 minutes and telling her that I thought my life was in danger, she said she would talk to one of your lawyers about my cases.**

**She left the room for about 10 minutes then brought back a woman who didn't look like a lawyer but said she was. After asking me more questions, she said that your law firm only handled civil right cases not civil lawsuits. She had no suggestion of a firm who might handle my case. As I was leaving, I asked for a copy of her notes. She says she shredded the notes after she decline to take the case. So I left with your plantlet.**

**I have attached memorialized notes of that day so you can understand that moment in time.**



# Davis|Bozeman LAW



## WHERE INJURY IS PERSONAL

**i.11**

**Plaintiff is asking for the following relief during these proceedings to trial:**

**Equitable Remedies**



**1)Immediate TRO to stop all surveillance totally of plaintiff and family with fines of 1 million dollars per violation to be paid to the court within 24 hours of the violation. Fines double after first violation and for each new successive violation. Violations can accumulate per day such as any illegal surveillance of any kind (GPS, any electronic/computer tracking, listening devices or monitoring devices of any electronics/ computer communications), slander or libel of any kind to anyone in or outside plaintiff's house or anywhere in the world to anyone or any place. Invading plaintiff's home or car in anyway will incur a 2 million dollars fine per event to be paid within 24 hours to the court. Plaintiff would like hourly accounting of funds spent by defendants and co-conspirators on this case.**

**2)Disclosure of all tracking devices or listening or monitoring devices in or outside plaintiff's home along with hidden cameras or listening devices in plaintiff's home, cars, LA Fitness, restaurants or any premises where plaintiff frequents.**

**3)Disclosure of any torture gadgets anywhere where plaintiff frequents or at home or anywhere in the world.**

**4)After TRO is fully implemented, Plaintiff will need thirty days to get proper RICO counsel to help prepare this complex complaint for trial litigation.**

**5)Scheduling of preliminary injunctions (PI) with the same requirements as the TRO but stronger restraints for the defendants and co-conspirators throughout the pre-trial, trial proceedings and post-trial proceedings with more stringent fines for any violations.**

**6)Disclosure of how defendants and co-conspirators got the equipment into plaintiff's home, his cars, rental cars, hotels, condos, cruise cabins, resorts or casino rooms.**

**7)Disclosure of who assisted defendants and co-conspirators with installing their equipment in his home (vendors like ADT, ATT, Comcast, DirecTV..etc) and whether impersonators were used for those vendors. When were the equipment installed? Were there any vendors who assisted or were bribe or extorted in assisting them with the installation of the equipment or any cooperating agencies?**

**8)Plaintiff wants to know the names, addresses, resume, driver's license numbers, passport numbers, time and billing sheets of all lawyer(s) /investigators firm(s) who worked on this case related to plaintiff Darryl Wright and family for the past 15 years. Names of all teams who traveled and stalked plaintiff all over the world. They know plaintiff and family for years but plaintiff do not know them.**

**9)Disclose how defendants are getting in and out of plaintiff's home without being detected by plaintiff's surveillance systems.**

**10)All audios, videos and pictures collected by defendants and co-conspirators of plaintiff in and out of his home, of his family in and out of their home, hotel rooms, condos, cruise ships and cabins, casinos and his friend's home or associate's home's or co-conspirators premises or properties. Plaintiff wants the dates, venues, team member names of who videoed and photographed the content and the resume of those who captured the data and who those items were shown to or played for over the years and why they were shown the content.**

**11)Disclosure of the location of the monitoring site(s) used to monitor and torture plaintiff and his family in his home or anywhere in the world.**

**12)Disclose any equipment used by defendants or coconspirators on their premises. What was the equipment used for? Does it detect anything? If so, what did it detect and how many times?**

**13)Defendants and co-conspirators shall disclose all drugs used on plaintiff to cause excessive urination, nose and eye watering, excessive bowel movements, nerve agents causing skin and face skin to palpitate, drugs causing hallucinations, hypnosis and depression.**

**14)Have the drugs used on plaintiff and family been tested for long-term use in the body of a human either separately**

**or as a combination? Are any of them a carcinogen either separately or in combination?**

**15)Disclose what accelerants were used to spike plaintiff cigars. Has the accelerants' been tested as a carcinogen or long-term use?**

**16)Disclose of any motion-activated devices or automated devices in his home or cars.**

**17)Disclosure by defendants or representative of what was said to co-conspirators for them to act against their own interests and against the interest of plaintiff and family.**

**18)Team members' names, address, driver's license number and passport numbers of all who stalked plaintiff in his house and anywhere in the world for the past 15 years. Those who participated in the criminal torment of plaintiff and family.**

**19)Disclosure of all communications between defendants or co-conspirators or their team's with local, state and federal law enforcement authorities where plaintiff and family were stalked.**

**20)Defendants and co-conspirators shall collectively fund plaintiff a new house in a new neighborhood with new computers/electronics for him and his family, new cars, new cloths and new furniture for the house before, during**

**and after trial. Defendants and co-conspirators will fund around the clock security for plaintiff and family to insure no harm or unlawful surveillance of plaintiff and family anywhere in the world indefinitely or for the rest of their lives.**

**On 10/16/2019, plaintiff was illegally tracked to and inside of the US Northern district court building at 75 Ted Turner Drive Atlanta, Ga. Plaintiff has sent the US Marshals an evidence preservation letter for the video of the 1<sup>st</sup>, 5<sup>th</sup>, 6<sup>th</sup>, 7<sup>th</sup>, and 22<sup>nd</sup> floors for that day. Plaintiff wants to who the trackers are and who gave them permission to track plaintiff in a federal building.**

**21)Disclose how PCE knew plaintiff was going to the Federal building on 10/16/2019. Plaintiff told no one.**

**22)Disclose how plaintiff was tracked without his phone or watch?**

**23)Disclose communications between PCE and Associated Credit Union(ACU). What did PCE tell ACU about plaintiff? What did ACU disclose about plaintiff? What did ACU do for PCE?**

**24)Compensatory and punitive damages will be determined after full discovery process is over on defendants and coconspirators.**

**25)Judgement in an amount equal to three times the actual damages sustained by RICO, pursuant to 18 U.S.C. 1964.**

**26)Reasonable attorney's fees, pursuant to 18 U.S.C. 1964.**

**27)Judgment in an amount equal to three times the actual damages sustained by the RICO statue, pursuant to O.C.G.A. 1614.**

**28)Attorneys' fees in the trial and appellate courts and costs of investigation and litigation reasonably incurred, pursuant to O.C.G.A. 16-14-6.**

**29)Appropriate orders judgements prohibiting defendants and co-conspirators from engaging in violations of law alleged herein, pursuant to O.C.G.A. 16-14.**

**30)Judgment in the amount to be proven at trial that requires defendants and co-conspirators to disgorge any unlawful profits or otherwise return the full amount of its unjust enrichment.**

**31)Trial by jury: and**

**32)Such other relief as the Court deems just and proper.**

**No American should feel comfortable with these organized criminals running around in our streets deliberately breaking local, state, federal and international laws for their rich wealthy clients and defrauding the U.S. justice system.**

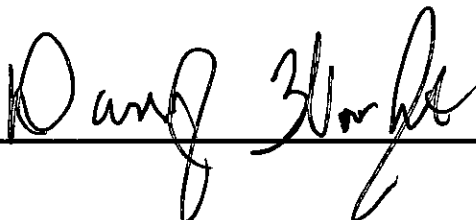
**This is January 21, 2021**

**Respectfully submitted,**

**Plaintiff**

**Darryl Wright**

**Darryl and Rochelle Wright and Jovettia Cooper  
265 Lynshire Court  
Marietta, Ga 30064  
770-499-2245(Home)  
404-307-5334(cell)**



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Date January 21, 2021